



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

file 6M

67

JUL 13 1984

MEMORANDUM

SUBJECT: Transmittal of Inspection Report

FROM: Robert B. Dona *R B Dona*  
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael J. Sanderson  
Chief, AWCM/ARWM

This memorandum transmits the following RCRA compliance inspection report performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA I.D. Number</u>	<u>Activity Number</u>	<u>Areas of Non-compliance</u>
General Motors Corporation Kansas City, Missouri	MOD000822668	A022	No program to assess tank condition; Contin- gency plan deficiencies; Training program deficien- cies; Inadequate aisle spacing; No estimated date of closure.

Attachment

RECEIVED

JUL 13 1984

AIR AND HAZARDOUS MATERIALS  
DIVISION



R00161510  
RCRA RECORDS CENTER

7-13-84

cc: Mr. [unclear]  
8/1/61  
S. [unclear]

100-83



DIVISION OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

RECEIVED

MEMORANDUM

TO: SAC, NEW YORK  
FROM: SAC, NEW YORK (100-83)

SUBJECT: [unclear] - [unclear] - [unclear]

Reference is made to the letterhead memorandum dated [unclear] and captioned as above, and to the letterhead memorandum dated [unclear] and captioned as above.

Enclosed for the New York Office are two copies of a letterhead memorandum dated [unclear] and captioned as above, and one copy of a letterhead memorandum dated [unclear] and captioned as above.

Very truly yours,  
[Signature]

MEMORANDUM

JUL 13 1961



DIVISION OF INVESTIGATION  
U.S. DEPARTMENT OF JUSTICE

RECEIVED

REPORT OF RCRA COMPLIANCE INSPECTION

AT

GENERAL MOTORS CORPORATION

GM ASSEMBLY DIVISION - LEEDS PLANT

KANSAS CITY, MISSOURI

EPA I.D. NUMBER: MOD000822668

JUNE 4 AND 19, 1984

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY

Region VII

Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (ARWM), a RCRA compliance evaluation inspection was performed at General Motors Corporation, GM Assembly Division-Leeds Plant, in Kansas City, Missouri, on June 4 and June 19, 1984. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

General Motors Assembly Division-Leeds Plant (GM):

Jerome E. Daniels, P.E., Director-Plant Engineering

Larry N. Pemberton, Environmental Engineer\*\*

Jack Still, Supervisor-Maintenance\*

Robert Kirksey, Supervisor-Maintenance\*

Don R. Conner, General Supervisor-Outside Maintenance\*\*

Missouri Department of Natural Resources (MDNR):

Steven Johnson, Environmental Specialist, Kansas City Regional Office\*

U.S. Environmental Protection Agency (EPA):

John W. Bosky, Environmental Engineer, ENSV

Norma Sandberg, Environmental Engineer, ARWM\*

Don Sandifer, Environmental Engineer, ARWM\*\*

\* Present only on June 4, 1984

\*\* Present only on June 19, 1984

## INSPECTION PROCEDURES

On June 4, 1984, at approximately 10:00 a.m., I arrived at the GM-Leeds Plant in Kansas City, Missouri, to conduct an unannounced RCRA compliance evaluation inspection. When I asked for Larry Pemberton, who is listed as the official facility contact, I was informed that he was away from the plant and was not scheduled to return until the following week. I then contacted Mr. Jerome Daniels, who is the Director of Plant Engineering. The inspection on June 4 was conducted with Mr. Daniels and Messrs. Jack Still and Robert Kirksey, who are GM maintenance supervisors. Prior to the inspection, I presented them with my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. During this part of the inspection, we discussed facility operations and waste generation. In addition, a visual inspection was conducted at the drum storage area. Although the facility's manifest file and drum storage log-book were examined at this time, no review of other required plans and records was made due to the absence of Mr. Pemberton (who is responsible for developing and maintaining the necessary plans, programs and records). On June 19, 1984, I returned to the GM-Leeds Plant to complete the inspection. Facility representatives were given prior notification of my intention to finish the inspection on this date. This segment of the inspection was conducted with Mr. Larry Pemberton, Environmental Engineer, and Mr. Don Conner, General Supervisor of Outside Maintenance. In addition, Mr. Daniels was present at the beginning and conclusion of our discussions. Prior to this segment of the inspection, I presented them with my EPA credentials and explained the purpose of the inspection and the procedures that I would follow. The inspection consisted of a discussion of wastes generated at the facility and how they are managed, a review of the facility's waste management plans, programs and records, and a visual inspection of the hazardous waste drum storage area and the waste solvent storage tank.

At the conclusion of the inspection, I summarized and reviewed my findings and recommendations with Messrs. Daniels, Pemberton and Conner. I provided Mr. Daniels with a RCRA Inspection Confidentiality Notice, which he declined to sign as acknowledgement of receipt. A copy of this notice listing an alternate facility official is attached to this report. I then presented Mr. Daniels with a Notice of Violation which he reviewed and signed as acknowledgement of receipt. A copy of this notice is attached. In addition, photocopies were obtained of several facility documents, which are attached to this report, as well as a document receipt.

## FACILITY DESCRIPTION

The General Motors-Leeds Plant in Kansas City, Missouri, is an automobile assembly facility. All automobile components are brought into the facility in finished form and no parts or component manufacturing occurs on-site. The plant employs over 5000 persons and operates 2 shifts, 5 days per week (third shift for maintenance only). Facility processes include the welding

of body and component part assemblies; the cleaning and preparation of body and parts assemblies for painting; the prime and finish painting of body and component parts; and the assembly of all other automobile parts into the body to make a complete automobile. This facility produces the J-series automobiles (Skyhawks and Firenzas).

Prior to priming and painting, a body assembly goes through a multi-stage degreasing and preparation process. This process is summarized as follows:

- Step 1 - High pressure water-blast cleaning.
- Step 2 - Two-stage cleaning and degreasing using a caustic-based cleaning agent.
- Step 3 - Two-stage water rinse, water is recirculated with overflow to industrial sewer.
- Step 4 - Zinc-phosphating of body, spray system used.
- Step 5 - Two-stage water rinse, overflow to industrial sewer.
- Step 6 - Chromic acid rinse (stated to rid the surface of salts).
- Step 7 - Deionized water rinse (once through flow).

The prepared body next goes through an electrophoretic (ELPO) paint dip process where the body is dipped into a water-based paint coating. This is an electric-voltage process. The coated body is then rinsed in a 4-stage system described as follows:

- Stage 1 - Deionized water rinse.
- Stage 2 - Deionized water rinse.
- Stage 3 - Water rinse (city water).
- Stage 4 - Deionized water rinse.

The coated body is next made water-tight by the manual application of sealers to joints and seam crevices.

After the body has been sealed, a liquid primer is applied electrostatically within a spray booth. Primer overspray is removed from the exhaust draft in a water-collection system. This primer coat is then cured in a gas-fired oven. The primed body next goes through a spray booth where black paint is applied to areas such as around doors and under the hood. The body then goes through another curing oven. At this point, the entire body is manually wet-sanded and dried in an oven in preparation for exterior painting.

Exterior paint is applied manually within a 200 foot long spray booth using an electrostatic process. Overspray is removed from the exhaust draft using a water-collection system. The exterior paint is cured in an oven, followed

by light sanding and touching-up of minor flaws. The painted auto body next goes through a second spray booth/oven curing system where two-tone cars receive their second color application. All horizontal surfaces of the painted body are then lightly sanded using a fine sandpaper and oil. This is followed by a paint "reflow" process where the body is baked in an oven for around 30 minutes at 300-350°F. In this process, the paint actually melts and flows to a fine finish. After this stage, the body is ready for final assembly.

#### FINDINGS AND OBSERVATIONS

1. The General Motors-Leeds Plant in Kansas City, Missouri, submitted a Notification of Hazardous Waste Activity on August 12, 1980. This notification listed them as a generator and a TSD facility. On November 18, 1980, a Part A Permit Application was submitted by General Motors for this facility. This application listed tank and container storage and two treatment processes. On August 17, 1982, the U.S. EPA requested that the Part B Permit Application for the General Motors-Leeds Plant be submitted within 6 months. This application was submitted by General Motors on February 15, 1983. Attached to this report are several pieces of correspondence regarding the review of GM's Part B Permit Application for the Leeds Plant.
2. Plant representatives have indicated their intention to request the withdrawal of their permit application and change their status to that of a generator only (see letter dated May 3, 1984). At the time of this inspection, a draft withdrawal request had received verbal approval, but had not yet received final corporate authorization. It was not known when this request would be submitted by GM.
3. As a result of their assembly operations, GM-Leeds generates various wastestreams, some of which are classified as hazardous. A description of each wastestream, how each is generated, its classification and the method of handling and/or disposal are summarized as follows:

Waste Solvent - GM-Leeds uses a Naptha and Toluene solvent mixture to clean painting equipment and spray guns. This waste solvent is collected in drums and placed in the facility's drum storage yard. In addition, waste solvent is generated from a purging process used to clean painting machines when changing colors. The purge solvent is collected in an underground tank. Acetone is added to the solvent mixture before use at varying times of the year in order to maintain thinner property consistency. All spent solvent is collected by Solvent Recovery Corporation and transported to their facility in Kansas City, Missouri. Approximately 7,000 gallons of spent solvent is collected every 6 weeks. All shipments of spent solvent are by tank trucks with any accumulated drums being pumped into the same truck used to empty the underground tank. All solvent is used as a mixture. GM has classified this waste as ignitable.

Caustic Sludge - The Leeds Plant has caustic cleaner vats which are used periodically to clean/degrease metal parts. Whenever one of these vats is cleaned, a sludge is generated which Leeds has classified as corrosive. In the past, this sludge has been disposed of at the U.S. PCI facility in Waynoka, Oklahoma.

Lead Solder Waste - This wastestream waste was generated from a lead soldering operation used on the joints of auto bodies. The Leeds Plant switched to a silicon-bronze process in October 1980, and this waste is no longer being generated.

Paint Sludge - The Leeds Plant generates a paint sludge from the water collection systems used to clean overspray from the exhaust draft on the facility spray booths. This sludge has been tested and was found to be non-hazardous. This wastestream is disposed of at U.S. PCI in Oklahoma.

Waste Paint - Periodically, the Leeds Plant will generate small quantities of off-specification paint. This waste paint is transported to the Solvent Recovery Corporation facility in Kansas City, Missouri. GM has classified the waste paint as an ignitable hazardous waste.

Chromic Acid Sludge - In the past, the Leeds Plant generated a sludge from a chrome reduction treatment system. This system was used to treat wastewater from the chromic acid portion of the body preparation process. The Leeds Plant has switched to a non-hexavalent type of chromic acid and the treatment system is no longer in use. All sludge that was generated from the treatment system was disposed of as a hazardous waste at U.S. PCI in Oklahoma.

Waste Oil - Waste oil generated at the Leeds Plant is collected in drums and stored at the hazardous waste drum storage yard. In the past, waste oil has been collected for recycling by Radium Petroleum.

Bonderite Sludge - The Leeds Plant generates a sludge from the filtration and clean-out of their zinc-phosphating spray system. This sludge has been tested and was found to be non-hazardous. The sludge is disposed of at the U.S. PCI facility in Oklahoma.

ELPO Sludge - A sludge is generated from the clean-out of the facility's electrophoretic (ELPO) paint dip process. The sludge has been tested and found to be EP Toxic for lead. This sludge is transported and disposed of as a hazardous waste at the U.S. PCI facility in Oklahoma.

Waste Sealers, etc. - The Leeds Plant generates various waste sealers, adhesives, plastisols and rust preventatives. These wastes have been classified as hazardous due to lead content. These wastes are drummed and disposed of at the U.S. PCI facility in Oklahoma.

Flow-Coat Waste - In the past, the Leeds Plant generated a waste paint from a "Flow-Coat" process which is no longer used. This waste was classified as hazardous due to ignitability and disposed of through U.S. PCI.

4. A pre-treatment system is being planned for facility process wastewater which is currently being discharged directly to their industrial sewer system. It should be noted that any sludge generated from this pre-treatment system would be classified as a F006 - listed hazardous waste since zinc-phosphating wastewater would be included in the system influent.
5. Around 6 months ago, the Leeds Plant began using an underground tank to store waste solvent from their paint purging process (see attached letter from GM dated May 16, 1983). The capacity of this tank was estimated at 12,000 gallons. The tank is completely underground and has a tank inspection manhole. The tank is vented to a concrete diked area (see photos #B14-B17). Facility representatives stated that this tank was constructed of steel, but were unsure of when it was installed. Facility representatives also stated that (per corporate policy) the tank is to be checked yearly using a rodding procedure to see if the liquid level decreases over a period of time. When asked if the tank is being inspected daily pursuant to 10 CSR 25-7.050(4)(G.1), Mr. Pemberton stated that he was unsure of how often the tank is inspected or checked and that he was not aware of any documentation of tank inspections. In addition, when asked for a written schedule and procedure for assessing tank condition pursuant to 10 CSR 25-7.050(4)(G.2), Mr. Pemberton stated that there was no other written procedure for evaluating the tank's condition except for the yearly level check. Facility representatives stated that no waste is ever stored in this tank for over 90 days.
6. Due to the probability that the Leeds Plant would request the withdrawal of their Part B Permit Application and change their status to a generator only, I was asked to determine if the facility had ever actually stored hazardous waste over 90 days. During the inspection, several drums of waste were observed that had been in storage over 90 days (see photos #B3 and B4).
7. When the hazardous waste drum storage yard was inspected on June 4, 1984, two drums containing hazardous waste were observed to be in marginal condition (see photo #A9). In addition, a row of drums was stacked along a wall without any aisle spacing in such a fashion that it would not be possible to properly inspect many of the drums (see photo #A6). When the drum storage yard was again inspected on June 19, 1984, all drums observed were in acceptable condition. In addition, although the west wall at the yard had been removed to allow access to the drums stacked along that side, two rows of drums in the interior of the yard were stacked so closely so as to not have adequate aisle spacing pursuant to 40 CFR 265.35 (see photos #B8-B11). All drums observed were closed and were properly marked and labeled. The drum storage yard was over 50 feet from the property line and was marked with warning and no smoking signs.
8. When asked for the plant's written inspection schedule pursuant to 40 CFR 265.15(b)(1), Mr. Pemberton presented a very general schedule which only addressed drum conditions at the drum storage yard. Facility representatives stated that plant security personnel are responsible for inspecting plant safety, security and emergency alarm equipment, but were unsure if and/or how these inspections are documented. In addition, when asked, Mr. Pemberton

stated that there was no written inspection schedule or inspection log for emergency spill response equipment and supplies such as absorbants and other clean-up equipment, which would be necessary in the event of a spill or other incident.

9. When asked for documentation of personnel training pursuant to 40 CFR 265.16, Mr. Pemberton presented a list of 9 individuals to whom a training manual had been distributed. In addition, 4 persons associated with hazardous waste management have recently attended a formal seminar. When asked for a listing of persons, job titles and job descriptions, Mr. Pemberton presented a listing of two hourly workers with their job titles and hazardous waste management duties. Upon further inquiry, it was stated that only one of these workers (Mr. J. Garner) was working directly with hazardous waste on a full-time basis and that one other person (Mr. Godfrey) was working with hazardous waste on a part-time basis. Mr. Godfrey was not listed as having received hazardous waste training or being in a hazardous waste management job, although it was stated that he had received necessary training. In addition, none of the seven persons listed as emergency coordinators in the facility contingency plan are listed as being part of the hazardous waste training program pursuant to 40 CFR 265.16. Since a facility emergency coordinator is responsible for directing and coordinating all facility response and remedial actions in the event of a hazardous waste incident (as outlined in 40 CFR 265.55 and .56), it is important that they be included in the personnel training program and that all necessary training be identified and provided.

10. The facility contingency plan does not include a description of arrangements with local authorities pursuant to 40 CFR 265.52(c).

11. The facility contingency plan has not been submitted to any local authorities who could be expected to respond to a hazardous waste emergency pursuant to 40 CFR 265.53.

12. The facility contingency plan lists 7 persons who are authorized to act as the emergency coordinator, one of whom will always be at the plant. However, the flowcharts used as the notification procedure for the emergency coordinator list only an internal telephone extension number and not a full telephone number that would be usable by outside authorities pursuant to 40 CFR 265.52(d). In addition, it does not appear as though one person is designated as the primary emergency coordinator pursuant to 40 CFR 265.52(d) (Refer to attached notification flowcharts).

13. The facility contingency plan does not include a full listing of all emergency equipment maintained at the facility (including its physical description, location and capabilities) which would be necessary to respond to a hazardous waste emergency incident. All of this equipment information is required pursuant to 40 CFR 265.52(e) (Refer to attached contingency plan).

14. The facility closure plan does not list an estimated year of closure pursuant to 40 CFR 265.112(a)(4). The plan states that "closure will be dependent upon the life of the manufacturing facility" (Refer to attached closure plan).

15. The facility closure plan lists a waste solvent disposal cost estimate of "no charge". Spent solvent from the Leeds Plant is currently being sold to Solvent Recovery Corporation for 5 cents per gallon.

#### RECOMMENDATIONS

1. The Leeds Plant should develop and maintain an inspection program for their underground waste solvent storage tank pursuant to 10 CSR 25-7.050(4)(G). *class I*
2. Leeds officials should ensure that adequate aisle spacing is maintained at all times between rows of drums stored at their facility.
3. The Leeds Plant's written inspection schedule and logbooks should be amended to include all equipment specified under 40 CFR 265.15(b)(1). *class III*
4. The personnel training program should be updated on a regular basis to include all persons involved with hazardous waste management. In addition, the plant's emergency coordinator should be included in the personnel training program. *class*
5. The facility contingency plan should be amended to include all necessary information. This contingency plan should be submitted to all local authorities who might respond to a hazardous waste emergency.
6. The facility closure plan should list a year of anticipated closure.

*John W. Bosky*  
 John W. Bosky  
 Environmental Engineer  
 Date: 7-12-84  
 Activity Number: A022

*Robert B. Dona*  
 Robert B. Dona  
 Chief, Field Investigations Section  
 Date: July, 12, 1984

#### Attachments:

Inspection Checklist (3 pages)  
 Notice of Violation (3 pages)  
 Photographs (9 pages)  
 Biennial Generator Report - 1983 (4 pages)  
 GM Letter on Storage Tank - May 16, 1983 (2 pages)  
 Emergency Coordinator Flowcharts (2 pages)  
 Closure Plan (3 pages)  
 Contingency Plan (28 pages)  
 Correspondence between EPA, MDNR and GM - Permit Applications (51 pages)  
 Confidentiality Notice (3 pages)  
 Document Receipt

**Interim Status Checklist**  
10 CSR 25-7.011(1)(D)

Name of Facility: GENERAL MOTORS ASSEMBLY DIVISION - LEADS PLANT

Date: JUNE 4<sup>th</sup> 1984

Address: 6817 STADIUM DRIVE

KANSAS CITY, MISSOURI 64129

Missouri I.D. # 01486

Facility Representative: LARRY N. PEMBERTON

EPA I.D. # MO000822668

Title: ENVIRONMENTAL ENGINEER

Phone Number 913/281-7388

Is this facility a TSD? YES

Transporter? NO # N.A.

Provide a brief description of the manufacturing process.

SEE NARRATIVE

List the hazardous wastes produced: SEE NARRATIVE

	<u>Waste</u>	<u>Amount/month</u>	<u>Kilogram/month</u>	<u>I.D. #</u>	<u>Disposition</u>
1.					
2.					
3.					
4.					
5.					
6.					
Total					

Subtract amount going to Resource Recovery or sewer

Amount subject to generator fee

(Fee is applicable if this value is over 10 kkg annually.  
Fee based on generation from July 1 through June 30)

Is generator fee applicable to this facility? Yes ☐ No ☐ (If yes, is it being paid? Yes ☐ No ☐)

Is the head tax applicable to this facility? Yes ☐ No ☐ (If yes, is it being paid? Yes ☐ No ☐  
(Quarterly ☐ Annually ☐)

Is the land disposal fee applicable to this facility? Yes ☐ No ☐ (If yes, is it being paid? Yes ☐ No ☐)

N.A. If the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes ☐ No ☐

N.A. If the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes ☐ No ☐

N.A. If 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes ☐ No ☐

N.A. Has the generator determined if waste is hazardous? Yes ☐ No ☐

**A. MANIFESTS 10 CSR 25-5.010(4)**

1. Generator's Missouri and EPA I.D. Numbers..... ☒
2. Serially increasing shipment number..... ☒
3. No. waste I.D. # correct..... ☒
4. Generator's name, address, phone number, EPA I.D. number... ☒
5. All transporters' names, addresses, phone numbers, and EPA I.D. numbers..... ☒
6. Hazardous waste management facility name, address, phone number, and EPA I.D. number..... ☒
7. Proper DOT shipping name and hazard class..... ☒
8. Quantity, container type, and number of units being shipped..... ☒
9. Emergency instructions and special handling procedures.... ☒
10. Proper certification..... ☒
11. Manifest properly signed and dated..... ☒
12. Time between generator and facility signature no more than 10 days..... ☒

13. Manifests returned within 30 days..... ☒
14. If not, exception generator report submitted within 45 days..... ☒ N.A.
15. Completed manifests submitted to Department quarterly..... ☒

**B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)**

16. Waste stored in proper DOT containers..... ☒
17. Containers labeled "Hazardous Waste" and labeled per proper DOT requirements during storage..... ☒

**C. STORAGE STANDARDS 10 CSR 25-7.050**

18. Facility inspected and maintained..... ☒ NOT THINK
19. Ignitable and reactive wastes properly handled..... ☒
20. Date of accumulation marked..... ☒ N.A.
21. Storage less than 90 days (if applicable)..... ☒ FOR THINK ONLY
22. Waste oil properly handled..... ☐

Off-site facility NOInterim Status YESProvide a brief description of the hazardous waste TSD Processes. SEE NARRATIVEList the hazardous wastes handled at each TSD process. SEE NARRATIVE

	Waste	Amount/month	I.D. #	TSD Process	Design Capacity
1.					
2.					
3.					
4.					
5.					
6.					

## I. WASTE ANALYSIS 40 CFR 265.13

58. Waste analysis plan..... ☒  
59. Identify hazardous wastes handled at facility..... ☒  
60. Means to confirm wastes received from off-site..... ☒ N.A.

## J. SECURITY 40 CFR 265.14

61. 24-hour surveillance system at facility..... ☒  
62. An artificial or natural boundary..... ☒  
63. A means to control entry..... ☒  
64. Restricted access sign posted at each entrance..... ☒  
65. Legible from a distance of 25 feet..... ☒ NOTE: NO SIGNS AT STORAGE TANK

## K. GENERAL INSPECTION

66. Inspection log and written schedule for inspecting..... ☒ REFER TO NARRATIVE FOR COMMENTS  
67. Inspect emergency equipment..... ☒  
68. Inspect security devices..... ☒  
69. Inspect operating and structural equipment..... ☒ - DRAW AREA ONLY

## L. PERSONNEL TRAINING 40 CFR 265.16

70. Completed classroom or on-the-job training..... ☒ REFER TO NARRATIVE  
71. Job title, description, and name of person filling position..... ☒  
72. Written record of the type and amount of training given..... ☒  
73. Documentation confirming that training has been given..... ☒

## M. PREPAREDNESS AND PREVENTION 40 CFR 265 Subpart C

74. Internal communication or alarm system..... ☒  
75. Device in the hazardous waste operation area capable of summoning emergency assistance..... ☒  
76. Fire control, spill control, and decontamination equipment available..... ☒  
77. Adequate water supply for fire control equipment..... ☒  
78. Adequate and proper safety equipment available..... ☒  
79. Adequate aisle space..... ☒  
80. Arrangements with local emergency agencies..... ☒ PARTIAL ARRANGEMENTS ONLY

## N. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 40 CFR 265 Subpart D

81. Contingency plan..... ☒  
82. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste..... ☒  
83. Describe formal arrangements with emergency agencies..... ☒  
84. Names, addresses, and phone numbers (home & office) of emergency coordinators..... ☒  
85. Emergency equipment including its description and location..... ☒ CAPABILITIES  
86. Evacuation plan if applicable..... ☒

Comment: \_\_\_\_\_

## O. MANIFEST, RECORDS, REPORTING 40 CFR 265 Subpart E

For off-site facilities N.A.

37. Manifests signed and dated..... ☒  
38. Copy to transporter..... ☒  
39. Copy to generator in 30 days..... ☒  
40. Copy at facility for 3 years..... ☒

## Operating record

91. Description, quantity, and TSD process for all hazardous wastes..... ☒  
92. Location and quantity of all hazardous waste..... ☒  
93. Waste analysis records from off-site sources..... ☒ N.A.  
94. Summary and description of emergency incidents..... ☒ N.A.  
95. Record of inspections..... ☒  
96. Monitoring, testing and analytical results if necessary..... ☒

## Reporting

37. Annual report..... ☒  
38. Unmanifested waste reports for off-site facilities..... ☒ N.A.  
39. Reports for emergencies, spills, closure..... ☒ N.A.

**HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY  
Interim Status Checklist  
10 CSR 25-7.011(1)(D)**

Page Three

**P. CLOSURE AND POST CLOSURE 40 CFR 265 Subpart G**

- 100. Closure plan for facility..... ☒
- 101. Description of how and when facility will be closed.... ☒ NO DATE
- 102. Estimate of maximum inventory of hazardous waste..... ☒
- 103. Steps to decontaminate equipment..... ☒ VERY GENERAL
- 104. Post closure plan for disposal facilities only..... ☒ N.A.

**Q. FINANCIAL REQUIREMENTS 40 CFR 265 Subpart H**

- 105. Cost estimate for facility closure..... ☒
- 106. Financial assurance for closure and post-closure..... ☒
- 107. Liability for sudden accidents..... ☒
- 108. Liability for non-sudden accidents for disposal only... ☒ N.A.

**R. INTERIM STATUS CONTAINERS 40 CFR 265 Subpart I**

- 109. Containers in good condition..... ☒ SEE NARRATIVE
- 110. Containers made of materials compatible with hazardous wastes placed into them..... ☒
- 111. Containers kept closed during storage..... ☒
- 112. Hazardous waste containers storage area inspected once a week..... ☒
- 113. Inspection log..... ☒
- 114. Containers holding ignitable or reactive waste at least 50 ft. from the property line..... ☒
- 115. Incompatible wastes placed in different containers.... ☒ N.A.
- 116. Are storage containers holding hazardous wastes which are incompatible with nearby materials separated by dikes, berms, walls, or other devices..... ☒ N.A.

**S. INTERIM STATUS TANKS CHECKLIST 40 CFR 265.192**

- 117. Tanks in good condition..... ☒
- 118. Uncovered tanks have a minimum of 2 ft. of freeboard..... ☒ N.A.
- 119. If not, is the tank equipped with a containment structure, a drainage control system, or a diversion structure..... ☒ N.A.
- 120. Tanks with continuous inflow equipped with a means to stop inflow..... ☒
- 121. Are wastes analyses conducted before placing a substantially different waste into a tank used for storage or treatment..... ☒ N.A.
- 122. Daily inspections conducted on discharge control equipment..... ☒

- 123. Data gathered from monitoring equipment once each day.. ☒
- 124. Level of waste in tanks checked at least once each day. ☒
- 125. Tanks inspected weekly..... ☒
- 126. Results of these inspections recorded..... ☒
- 127. If ignitable or reactive wastes in tanks, then is it treated, rendered, or mixed so that the mixture no longer meets the definition of ignitable or reactive... ☒ NO
- 128. Ignitable or reactive wastes stored properly..... ☒
- 129. Ignitable or reactive wastes in covered tanks in compliance with the National Fire Protection Agency's (NFPA's) buffer zone requirements..... ☒

**T. INTERIM STATUS SURFACE IMPOUNDMENTS 40 CFR 265 Subpart K** N.A.

- 130. 2 ft. of freeboard in surface impoundment..... ☒
- 131. Earthen dikes have protective covers..... ☒
- 132. Are waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment..... ☒
- 133. Freeboard level inspected each operating day..... ☒
- 134. Dikes and vegetation inspected weekly for leaks, deterioration, or failures..... ☒
- 135. Inspections recorded in inspection log..... ☒
- 136. Is the waste treated, rendered, or mixed so that mixture no longer meets the definition of ignitable or reactive..... ☒
- 137. Incompatible wastes segregated in separate surface impoundments..... ☒

**U. GROUNDWATER MONITORING 40 CFR 265 Subpart F** N.A.

- Applicable to surface impoundments, landfills and landfarms
- 138. Monitoring program and wells installed..... ☒
- 139. Sampling and analysis during first year quarterly (obtain copies) 265.92..... ☒
- 140. After first year, semi-annual sampling and analysis of indicator parameters..... ☒
- 141. After first year, annual sampling and analysis of ground water quality parameters..... ☒
- 142. Evaluation using students t-test 265.93(b)..... ☒
- 143. Alternate groundwater monitoring system 265.90(d)..... ☒

Comments: \_\_\_\_\_

Please mark boxes as shown

☒ In compliance

☐ In violation

Inspector's Signature John W. Borchert 6/22/84  
Title Environmental Engineer  
Office US EPA Region VII Environmental Services Division

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: GM LEEDS ASSEMBLY PLANT  
Address: 6817 STADIUM DRIVE  
KANSAS CITY, MISSOURI 64129  
EPA ID Nbr: M9D000522/668 Date: 6/17/84

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>	
<u>40CFR 265.15 (b)(1)</u>	<u>1. ALL SAFETY, EMERGENCY RESPONSE, SECURITY EQUIPMENT NOT ADDRESSED IN INSPECTION SCHEDULE</u>	<u>Class III</u>
<u>40CFR 265.15 (D)</u>	<u>2. INSPECTION OF ALL EMERGENCY RESPONSE EQUIPMENT NOT DOCUMENTED IN A LOG.</u>	<u>Class III</u>
<u>40CFR 265.16 (D.1)</u>	<u>3. LIST OF PERSONS FILLING HAZARDOUS WASTE MANAGEMENT POSITIONS NEEDS UPDATING</u>	<u>Class III</u>
<u>40CFR 265.16</u>	<u>4. EMERGENCY COORDINATES NOT PART OF PERSONNEL TRAINING PROGRAM.</u>	<u>Class II</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

**Distribution:**

Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: GM LEADS CONTINUED  
Address: \_\_\_\_\_

EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
10 CSR 25-7.50(4)(6)	1. NO INSPECTIONS/DOCUMENTATION FOR CLIENT STORAGE TANK
10 CSR 25-7.50(4)(6.2)	2. NO WRITTEN PROCEDURES FOR DETERMINING TANK CONDITION
40 CFR 265.52(a)	3. CONTINGENCY PLAN - DOES NOT INCLUDE ARRANGEMENTS WITH LOCAL AUTHORITIES (DESCRIPTION THERE-OF)
40 CFR 265.52(d)	8. CONTINGENCY PLAN - NEED COMPLETE PHONE NUMBER FOR EMERGENCY COORDINATIONS
40 CFR 265.52(b)	9. CONTINGENCY PLAN NOT SUBMITTED TO LOCAL AUTHORITIES
40 CFR 265.52(e)	10. CONTINGENCY PLAN DOES NOT HAVE A FULL LISTING OF ALL REQUIRED EQUIPMENT TECHNICAL LOCATION CAPABILITIES

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106. The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:  
Original-Facility Rep. Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Pink -AWCM Signature: \_\_\_\_\_  
Yellow -ENSV Title: \_\_\_\_\_  
Green -State

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

T0: Facility Name: GA LADS - CONTINUED  
Address: \_\_\_\_\_

EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

[illegible]

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The GM LEADS FACILITY is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

MICHAEL SANDELL, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106. The corrective actions taken by GCM LEEDS will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call DAVID DOYLE (U.S. EPA) at 816/374-7133, or PAUL MELTZER MDNR, at 314/757-3241.

This Notice prepared by John W. Brady Date 6/19/84

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.

Pink -AWCM

Yellow -ENSV

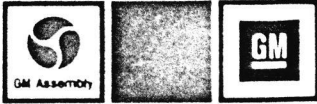
## Green -State

Printed Name: Jerome E. Daniels Date 6/19/84

Signature: James E. Daniel

Title: 1) DIRECTOR - PLANT ENGINEERING

#11



GM Assembly Division

General Motors Corporation

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

May 17, 1984

Mr. Kenneth "Joe" Davis  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Subject: Biennial Generator Report

Dear Mr. Davis:

After receiving your letter of April 30, 1984, we checked our records and have found that we submitted a Facility Biennial Hazardous Waste Report to the office of Mr. David Bedan on February 15, 1984. It appears to us that this submittal contains the information you are looking for. We are enclosing a copy of this report for your review. If this does not satisfy the requirements of your April 30 letter, please let us know.

Very truly yours,

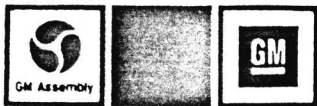
J. E. Daniels, Director  
Plant Engineering

By L. N. Pemberton

L. N. Pemberton  
Plant Engineering

LNP/ef

Enc.



**GM Assembly Division**

General Motors Corporation

February 15, 1984

**Leeds Plant**  
6817 Stadium Drive  
Kansas City, Missouri 64129

Mr. David E. Bedan  
Director-Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Subject: Ref. 10 CSR 25-7.011(1)(D)3. Biennial  
Report on Hazardous Waste Activities

Dear Mr. Bedan:

In compliance with your letter request dated January 27, 1984, we are enclosing our biennial report on hazardous waste activities at the GM Assembly Division, Leeds Plant.

Very truly yours,

J. E. Daniels, Director  
Plant Engineering

By

*L. N. Pemberton*  
L. N. Pemberton  
Plant Engineering

LNP/ef

Enc.

# ENVIRONMENTAL PROTECTION AGENCY

## FACILITY BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.  
Read All Instructions Carefully Before Making Any Entries on Form

### I. NON-REGULATED STATUS

Explain your non-regulated status in the space below.

See instructions before completing this section.

This facility did not treat, store, or dispose of regulated quantities of hazardous waste at any time during 1983. . . . . ☐

Please print type in the type 12 character per inch

### II. FACILITY EPA I.D. NUMBER

T/A C

M 0 D 0 0 0 8 2 2 6 6 8

1 2

13 14 15

This Facility's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only ☐ Permanently
- ☐ Other (explain in comment section)

### III. NAME OF FACILITY

G M A S S E M B L Y D I V I S I O N - L E E D S P L A N T

30

69

### IV. FACILITY MAILING ADDRESS

3 6 8 1 7 S T A D I U M D R I V E

15 16

45

Street or P.O. Box

K A N S A S C I T Y

15 16

City or Town

M 0 6 4 1 2 9

41 42 47

51

State

Zip Code

### V. LOCATION OF FACILITY (if different than section IV above)

5

15 16

45

Street or Route number

6

15 16

City or Town

41 42 47

51

State

Zip Code

### VI. FACILITY CONTACT

P E M B E R T O N L A R R Y

15 16

45

Name (last and first)

9 1 3 - 2 8 1 - 7 3 8 8

46

55

Phone No. (area code & no.)

### VII. COST ESTIMATES FOR FACILITIES

\$ 3 0 0 0 0

16

19

22

A. Cost Estimate for Facility Closure

\$ 2 5 2 8 3 1

25

28

31

B. Cost Estimate for Post Closure Monitoring and Maintenance (disposal facilities only)

### VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. J. SLACHTA, PLANT MANAGER

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

2-14-84

Tear out here

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Facility Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: \_\_\_\_\_ Rec'd by: \_\_\_\_\_

IX. FACILITY'S EPA I.D. NO.

T/A C

EMOD000822668  
1 2 13 14 15

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

GM ASSEMBLY-LEEDS PLANT ON-SITE ☒

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G M O D 0 0 0 8 2 2 6 6 8  
16 28

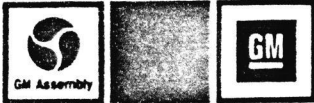
XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

S01 AMOUNT OF WASTE UOM S02 AMOUNT OF WASTE UOM S03 AMOUNT OF WASTE UOM  
S04 AMOUNT OF WASTE UOM S05 AMOUNT OF WASTE UOM

XIV. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
29	32	WASTE SOLVENT ✓	D 0 0 1 33 36 37 40	S 0 1 49 51 52	4 8 5 9 0	G
	2	CHROME TREATMENT SLUDGE ✓	F 0 0 6 41 44 45 48	S 0 1	8 8 0	G
	3	WASTE SEALERS ✓	D 0 0 8 41 44 45 48	S 0 1	3 0 8 0	G
	4	FLOW COAT WASTE ✓	D 0 0 1 41 44 45 48	S 0 1	1 1 0 0	G
	5	ELPO WASTE ✓	D 0 0 8 41 44 45 48	S 0 1	1 2 1 0	G
	6	WASTE PAINT ✓	D 0 0 1 41 44 45 48	S 0 1	3 1 1 5	G
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)



GM Assembly Division

General Motors Corporation

May 16, 1983

*[Handwritten signature]*  
Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

Mr. John D. Doyle  
Chief, Technical Services Section  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Re: GMAD-Leeds Plant Storage Permit

Dear Sir:

Pursuant to the requirements of the Missouri Hazardous Waste Regulations for Storage Facilities, we are hereby notifying the Department that we are planning an addition to our existing storage facilities.

Due to a process change in our Paint Department, we will be generating a significant amount of waste thinner (purge thinner) which we plan to collect in an existing underground (closed) storage tank located in the existing tank farm area west of the assembly building. The tank to be used for storage is one of seven tanks located in this complex. (The other six are used for storage of other process fluids such as oils and virgin thinner.) We are estimating that we will generate approximately 2,500 gallons of purge thinner per month. The purge thinner collected will be shipped to a solvent reclaim (Resource Recovery) facility where the solvents will be reconstituted for resale to GM or to other customers.

Provisions will be made to comply with the Storage Tank Regulations, 10CSR 25-7.050(4).

We are enclosing a part-plot-plan showing the location of the existing tank farm and the tank to be used for reclaim thinner storage.

J. E. Daniels, Director  
Plant Engineering

BY *L. N. Pemberton*  
L. N. Pemberton  
Plant Engineering

EPA-ARWMI/SPRS

LNP/ef  
Enc.

cc: G. P. Boszak-GMAD-Central Office  
✓ R. L. Morby-U. S. EPA Region 7

MAY 19 1983

Region VII, Kansas City, Missouri 64106

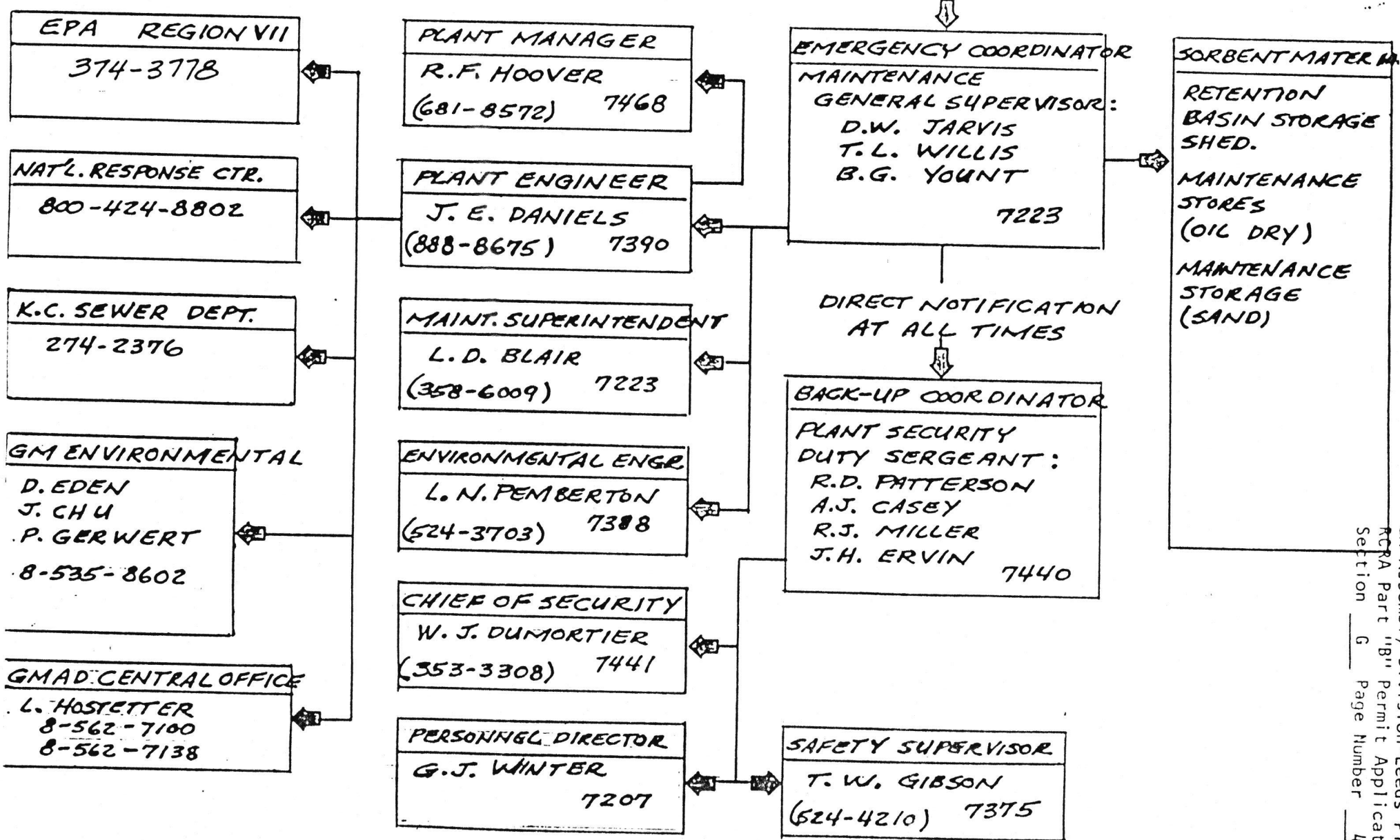
# COMMUNICATIONS FLOW CHART FOR RELEASE OF HAZARDOUS WASTE

OUTSIDE PLANT  
NOTIFICATION

PLANT  
MANAGEMENT

DIRECT RESPONSE

AUXILIARY  
ASSISTANCE



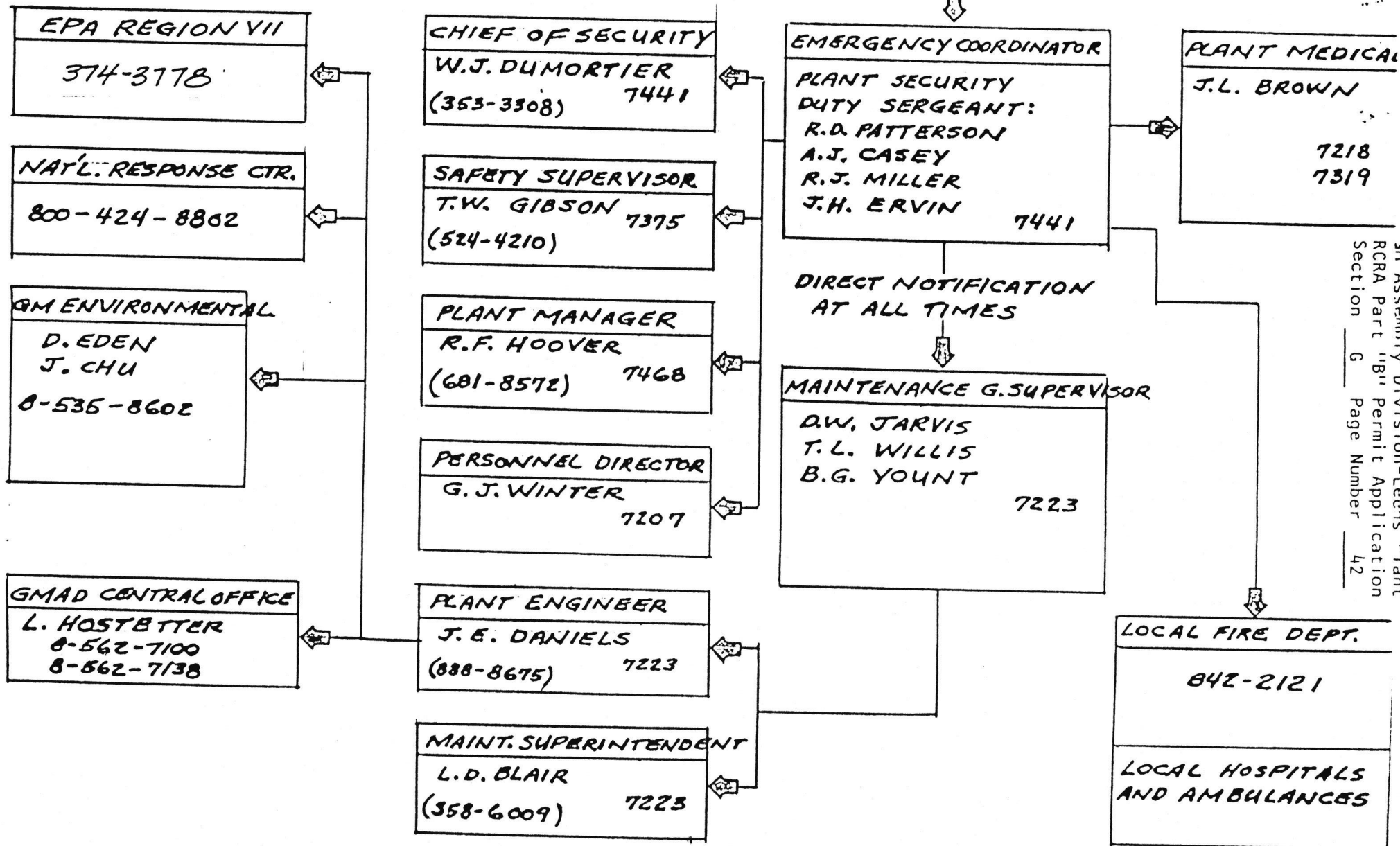
# COMMUNICATIONS FLOW CHART FOR FIRE AND EXPLOSION

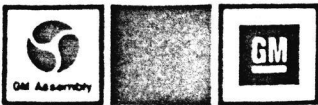
**OUTSIDE  
PLANT NOTIFICATION**

**PLANT  
MANAGEMENT**

**DIRECT RESPONSE**

**AUXILIARY  
ASSISTANCE**





GM Assembly Division

General Motors Corporation

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

February 13, 1984

Mr. David E. Bedan  
Director-Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Dear Mr. Bedan:

In response to your letter of January 10, 1984, we submit the following:

1. The revised financial mechanisms you have requested are presently being researched and prepared through our Corporate Environmental and Financial Staffs.

In a telephone conversation with our corporate people last week, we were told that they are moving forward on this with all haste. It is our understanding that they will be in direct telephone contact with Mr. Paul Meiburger of your staff this week to fill him in with where we are in accomplishing your request.

2. Ground water monitoring is not required at this facility.
3. A revised and updated closure plan and closure cost estimate is included with this correspondence.

J. E. Daniels, Director  
Plant Engineering

By   
L. N. Pemberton  
Plant Engineering

LNP/ef

Enc.

CLOSURE PLAN  
(For Storage Facilities in Existence  
Prior to November 19, 1980)

I. INTRODUCTION

Under the U. S. EPA regulations, 40 CFR Part 265, Subpart G. Sections 265.110 thru 265.120, each facility which stores, treats or disposes of hazardous wastes must have a Closure Plan on file. This Closure Plan has been prepared to cover the following facility:

1. EPA ID Number      MOD 000 822 668
2. Owner's Name:      General Motors Corporation  
                         GM ASSEMBLY DIVISION  
                         LEEDS PLANT  
                         6817 Stadium Drive  
                         Kansas City, Missouri 64129
3. This Plan has been prepared by L. N. Pemberton, Engineer

February 7, 1984

This Plan has been revised by L. N. Pemberton, Engineer

February 7, 1984

4. The Storage areas described in this Closure Plan consist of:
  - A. That area of the Drum Storage Facility that normally contains drums of designated hazardous wastes.
  - B. One underground storage tank used for storage of Paint Shop purge thinner.

II. MAXIMUM WASTE INVENTORY

The following listing shows the approximate maximum quantity of wastes on hand at any one time:

Sealers, sludges, oils	60 Drums
Waste solvents and thinners	40 Drums
Waste solvents and thinners (underground tank storage)	7,500 gallons

### III. SCHEDULE FOR CLOSING

This facility does not have a definite closure date. Closure will be dependent upon the life of the manufacturing facility. As long as the assembly plant is in operation, we assume the storage facility will be required. The following schedule is open ended. It lists the timetable for closure in terms of elapsed time subsequent to the time that EPA or authorized state agency, has approved this plan:

- Day 1 - Plant termination of hazardous waste activity.
- Day 2 thru 5 - Removal of stored drums.
- Day 6 thru 10 - Removal of tank stored solvents.
- Day 10 thru 25 - Clean up of storage area and clean out of storage tank.
- Day 26 to 30 - Inspection and certification of closure.

### IV. DECONTAMINATION OF FACILITY AND EQUIPMENT

The drum storage facility will be emptied of all drums. The concrete pod and sump will be thoroughly cleaned to remove all residual contamination.

The Waste Storage Tank will be emptied of its contents (Waste thinner). The contents will be delivered to a Resource Recovery facility where they will be burned at no charge. The tank will be cleaned and inspected.

### V. COST ESTIMATES FOR CLOSURE

- |   |              |
|---|--------------|
| 1. Remove and dispose of all drums to approved waste disposal facilities: | \$23,000     |
| 2. Clean up of concrete storage area and sump:                            | 4,000        |
| 3. Remove and dispose of waste solvents to R. R. facility:                | No charge    |
| 4. Clean out and inspect tank:  | 2,000        |
| 5. Certification of proper clean up for closure:                          | <u>1,000</u> |
| Total   | \$30,000     |

*currently not  
54/gallon  
from SAC*

Prepared by:

*L.N. Pemberton*

L. N. Pemberton, Engineer (Plant Engineering)

*M. G. Feuerborn*

M. G. Feuerborn, Gen. Supervisor (Financial Dept.)

SECTION G

CONTINGENCY PLAN

The information contained herein is submitted in accordance with the requirements for a Contingency Plan, as contained in 40 CFR 122.25(a)(7) and 264 Subpart D.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES FOR  
RCRA PERMITTED HAZARDOUS WASTE STORAGE

GM ASSEMBLY DIVISION  
LEEDS PLANT  
6817 STADIUM DRIVE  
KANSAS CITY, MISSOURI 64129

EPA I.D. NBR. MOD 000 822 668

AUTHORITY: Resource Conservation and Recovery  
Act ( RCRA ) 40 CFR 265.50, November  
19,1980.

REVISION DATE: 11/9/82

GMAD LEEDS CONTINGENCY PLAN AND EMERGENCY Section G Page Number 3  
PROCEDURES

---

I. INTRODUCTION:

This contingency plan is issued by GM Assembly Division, Leeds Plant, in order to establish procedures designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. These procedures must be carried out immediately whenever conditions as described above are present.

These plans and procedures are required by law under the Resource Conservation and Recovery Act of 1976 (RCRA), promulgated May 19, 1980, and effective November 19, 1980, under Part 265.50.

II. CONTENTS OF THE CONTINGENCY PLAN:

This contingency plan describes the actions facility personnel will take in responding to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous constituents to air, soil or surface water if found at G.M. Leed's RCRA permitted hazardous waste storage or treatment areas. This plan contains:

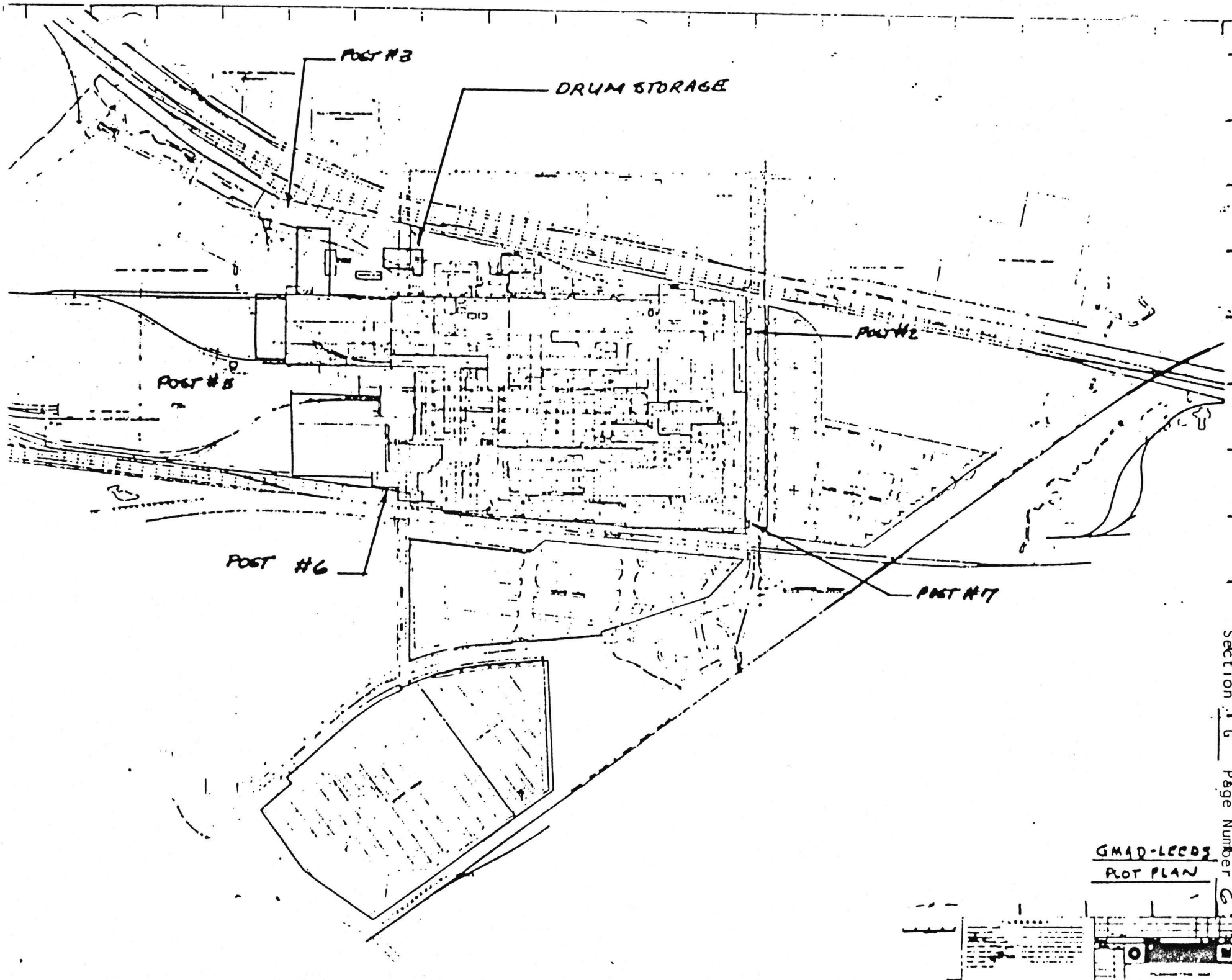
- A. RCRA permitted hazardous waste storage facilities.
- B. Emergency procedures:
  - 1) Emergency coordinator and procedure.
  - 2) In case of fire or explosion.
  - 3) In case of spill or release of hazardous waste.
- C. Disaster Control Plan.
- D. Contingency Plan Distribution.
- E. Ammendments.
- F. Communications or Alarm Systems.
- G. Emergency Equipment.

- A. RCRA permitted hazardous waste storage and treatment facilities at  
G.M. Assembly Division- Leeds Plant.

The areas of the Leeds Plant that are permitted under RCRA as hazardous waste storage or treatment facilities along with the type of waste handled are listed on the following page. This list does not include all areas that may cause possible hazards to human health or the environment but only those areas where prolonged storage ( over 90 days) of RCRA regulated hazardous waste is permitted. In any case, no matter what area it is, wherever there is a fire, explosion, or release of hazardous waste which could threaten health or environment, this contingency plan will be followed. A facility plot plan of GMAD-Leeds, showing the location of some of these areas along with entrance gates to plant property is included in the following pages.

WASTES, HAZARD, AND BASIS FOR HAZARD CLASSIFICATION

WASTE	HAZARD	BASIS FOR HAZARD CLASSIFICATION
Waste solvents	Ignitable	Typical solvent waste flash point 48°F.
Waste Paints	Ignitable	Flash points less than 140°F.
Chrome Treatment sludge	EPA listed	F006 - Waste water treatment sludge from electroplating operations
Caustic sludge	Toxic; corrosive	EP toxic (lead content) and corrosive (pH 12.5)
Waste sealer	Toxic	EP toxic (lead content)
Waste adhesive	Toxic and/or ignitable	EP toxic; also ignitable
Elpo	Toxic	(Water base paint waste) toxic; lead content
Flow coat	Ignitable	Marginal flash point
Rust preventative	Ignitable	Flash point 106°F.
Plastisol	Ignitable	Marginal flash point
Waste oil	Missouri regulations	None



GMAD-LEEDS  
ROT PLAN

B. Emergency Procedures

1) Emergency Coordinator:

At all times, there will be at least one employee whether on the facility premises or on call ( i.e. available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator will be thoroughly familiar with all aspects of the facility's contingency plan , all operations and activities at the facility, the location of all records within the facility, and the facility layout. In addition , this person will have the authority to commit the resources needed to carry out the contingency plan.

Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee, when the emergency coordinator is on call), will immediately:

- a) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel.
- b) Whenever there is a release, fire, or explosion, the emergency coordinator will immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests, and if necessary, by chemical analysis.
- c) Concurrently, the emergency coordinator will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects of the release, fire , or explosion. ( e.g. effects of any toxic, irritation, or asphyziating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- d) During an emergency, the emergency coordinator will take all reasonable measures necessary to ensure fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures will include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

B. Emergency Procedures ( Cont'd.)

1) Emergency Coordinator ( Cont'd).

- e) If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- f) If outside non-G.M. help is needed, the emergency coordinator will notify appropriate State or Local Agencies with designated response roles.
- g) Immediately after an emergency, the emergency coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility. The handling and disposing of these materials will comply with RCRA regulations.
- h) The emergency coordinator will ensure that, in the affected area(s) of the facility:
  - i. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.
  - ii. All emergency equipment used during the emergency is cleaned and fit for its intended use before operations are resumed.

If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he will report his findings as follows:

- i) If his assessment indicates that evacuation of local areas may be advisable, he will immediately notify appropriate local authorities. He will be available to help appropriate officials decide whether local areas should be evacuated.
- j) He will immediately notify plant management as shown on the communication flow charts in the following pages. Thru the plant management, notification to the Regional Administrator or the National Response Center will be made. This report will include:
  - i. Name and telephone number of reporter.
  - ii. Name and address of facility.
  - iii. Time and type of incident ( e.g. release, fire).

B. : Emergency Procedures ( Cont'd.)

1) Emergency Coordinator ( Cont'd).

- j) iv. Name and quantity of material(s) involved, to the extent known.
- v. The extent of injuries, if any.
- k) After the emergency, the Owner or operator will notify the Regional Administrator, and appropriate State and Local authorities, that the facility is in compliance with the following:
  - i. No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed.
  - ii. All emergency equipment used during the emergency is cleaned and fit for its intended use before operations are resumed.
- l) The Owner or operator will note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he will submit a written report on the incident to the Regional Administrator. The report will include:
  - i. Name, address, and telephone number of the Owner, or operator.
  - ii. Name, address, and telephone number of the facility.
  - iii. Date, time, and type of incident ( e.g., fire, explosion).
  - iv. Name and quantity of materials involved.
  - v. The extent of injuries, if any.
  - vi. An assessment of actual or potential hazards to human health, or the environment, where applicable.
  - vii. Estimated quantity and disposition of recovered material that resulted from incident.

2. In case of fire or explosions:

If fire or explosion occurs in any of the fore mentioned areas, in Part A, contact the Emergency Coordinator outlined on the Communications Flow Chart for Fire & Explosions, as shown on the following page. Report to the Emergency Coordinator the following information and follow any instructions that he may give.

- a) Name and Title, Department, and phone number.
- b) Location incident (e.g., column number, floor, and production area).
- c) Nature of incident ( e.g., fire, explosion and type of material involved).

B. Emergency Procedures ( Cont'd) .

3. In case of spill or release of hazardous waste:

If a spill of hazardous waste occurs in the plant, contact the Emergency Coordinator outlined on the Communications Flow Chart for Spills, as shown on the following page. Report to the Emergency Coordinator the following information and follow any instructions that he may give.

- a) Name and title, department, and phone number.
- b) Location spillage ( e.g., column number, department).
- c) Type of material.
- d) Estimated quantity and extent of spillage.

After reporting this informaton, take the following measures until the Emergency Coordinator arrives:

- a) The first action to be taken in the event of a spill, or the observation of spillage, is to prevent the pollutant from entering a public sewer. Immediate action should be taken to prevent further spillage and to confine the spilled material.
- b) Use dirt, sand, floordry, or other similar materials to dam the spill and prevent the flow of material.

Once the Emergency Coordinator arrives on the scene, he will instruct and coordinate the cleanup and containment operations:

- a) Inform plant management of the spill and its extent. The determination that a spill has occurred will be made by the Plant Engineer, Maintenance Superintendent, or Shift Maintenance Superintendant, or Maintenance General Foreman.
- b) In the event of a spill during a shutdown period in which none of the designated people are in the plant, Plant Protection will call one of the named people on the Flow Chart to obtain a decision on the spill.
- c) The responsibility for supervision of manpower and clean-up operation will be the Maintenance Department, providing such responsibility is not superceded by regulatory agencies.
- d) If no Maintenance Department personnel are in the plant, Plant Protection will provide supervision until Maintenance personnel are available.

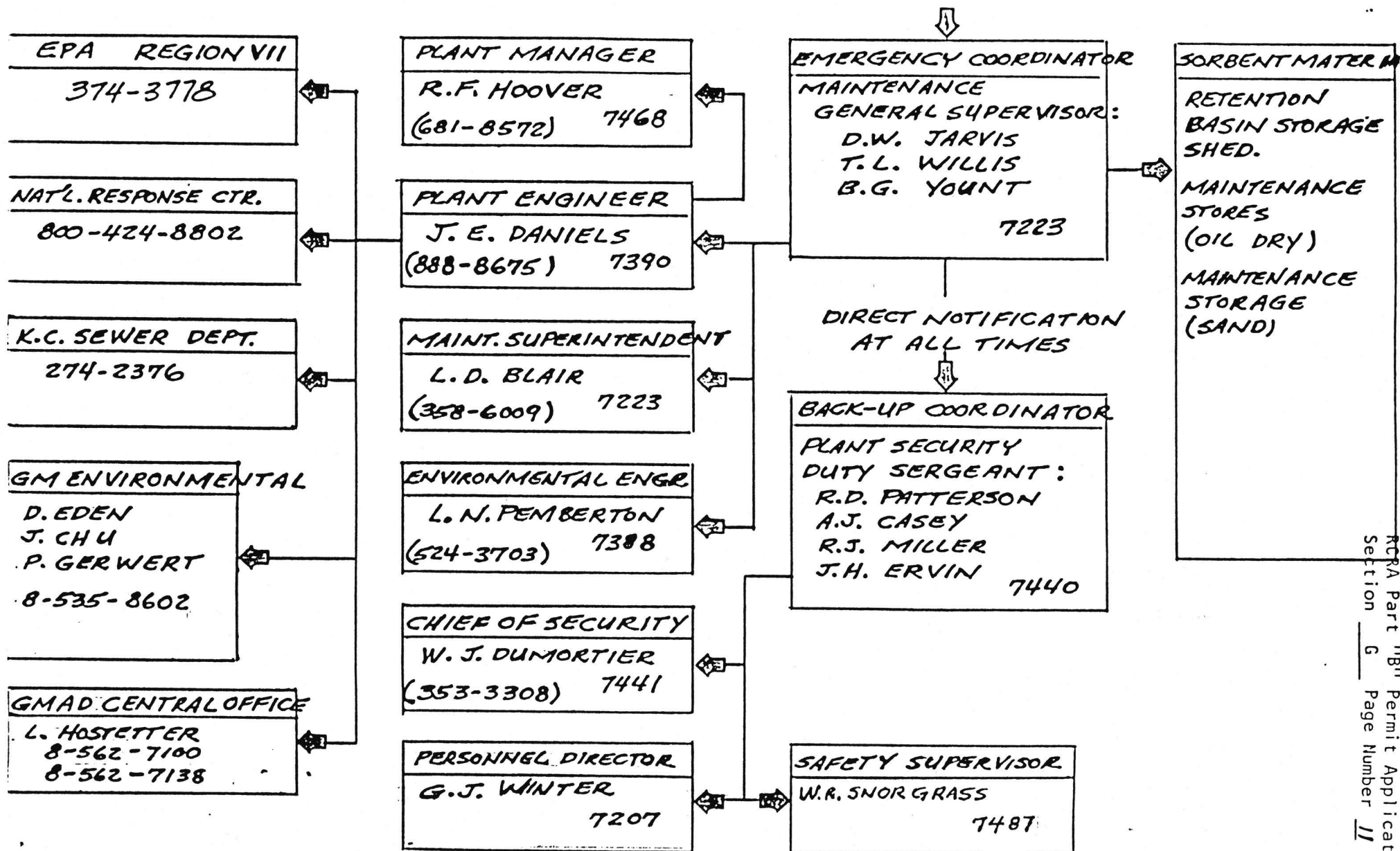
# COMMUNICATIONS FLOW CHART FOR RELEASE OF HAZARDOUS WASTE

## OUTSIDE PLANT NOTIFICATION

## PLANT MANAGEMENT

## DIRECT RESPONSE

## AUXILIARY ASSISTANCE



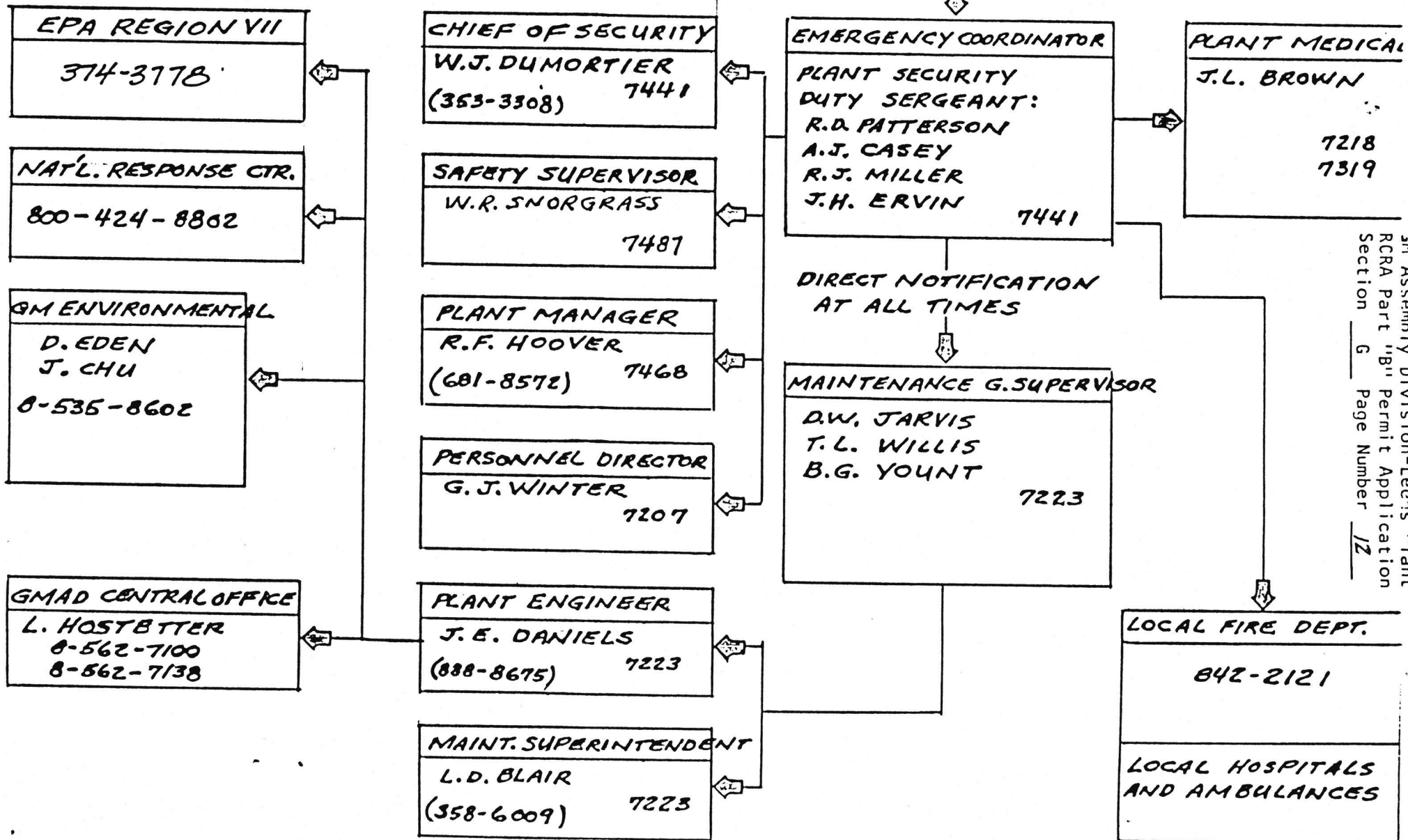
# COMMUNICATIONS FLOW CHART FOR FIRE AND EXPLOSION

**OUTSIDE  
PLANT NOTIFICATION**

**PLANT  
MANAGEMENT**

**DIRECT RESPONSE**

**AUXILIARY  
ASSISTANCE**



# DISASTER CONTROL PLAN

GENERAL MOTORS ASSEMBLY DIVISION

LEEDS PLANT

1982

- I. PURPOSE
- II. RESPONSIBILITY
- III. PERSONNEL
- IV. DISASTER CONTROL PROCEDURES
- V. RULES & GUIDE LINES FOR ORDERLY SHUT-DOWN OR EVACUATION
- VI. EVACUATION ROUTES BY PLANT AREAS
- VII. EVACUATION ROUTES FOR OFFICE EMPLOYEES
- VIII. RULES & GUIDE LINES FOR TAKE-SHELTER

note : Asterick (\*) in front of item or paragraph indicates a  
change from prior plan.

I. Purpose :

This plan has been formulated with prescribed procedures for action to be taken by management to safeguard our employees, and prevent damage to the plant.

The emergencies this plan will deal with are ;

1. FIRE
2. TORNADO
3. BOMB THREAT
4. ESCAPING GAS OR EXPLOSION
5. CIVIL RIOT

II. RESPONSIBILITY

- A. It is our intention of making this plan as simple as possible, but efficient in nature to handle any emergency so indicated.
- B. The Plant Manager or his designated representative will be the co-ordinator of the planning committee. The committee will consist of the Resident Comptroller, Personnel Director, Plant Engineer & Medical Director.
- C. The Plant Manager shall exercise overall command in any emergency or disaster.
  1. In the absence of the Plant Manager the Production Manager or Superintendents of their respective shifts will exercise overall command.
  2. The responsibility for control of all activities during a disaster shall rest with the Chief of Plant Security or Safety Supervisor who shall immediately, when instructed by the executive in command, set up a Disaster Headquarters in the Patrol Office.

The maintenance office will be utilized as a secondary control center if necessary.

3. The supervisor of Salaried Personnel will be the public relations spokesman to control press releases.

II. RESPONSIBILITY (continued)

- C. 4. The Plant Manager & Planning Committee will determine when rehearsals or test runs of this procedure will occur. This will be done on a regularly scheduled basis.
5. During times of emergencies, in the event salaried employees are unable to gain access to the plant, they should return to their residence and await further instructions from their department head.
6. The committee will ensure that utility maps of the plant are on micro film and stored at a location away from the plant.
7. Emergency copies of essential records are kept at Central Office and would be available at times of emergencies.

### III. PERSONNEL

- A. If a disaster should occur or appear imminent during other than working hours, the sergeant in charge of Plant Security shall immediately contact the Chief of Plant Security, Personnel Director, Plant Engineer & Plant Manager.
- B. The Plant Engineer shall immediately contact his key personnel, notify them to report as required.
- C. Any other key personnel that may be needed, shall be notified to report as required.
- D. A list of key personnel, plus the personnel who serve in different capacities during an emergency shall be maintained in the Plant Security Office to show their name, address and telephone numbers.

### IV. DISASTER CONTROL PROCEDURES

#### A. TYPES OF EVACUATION

##### 1. Partial Evacuation

In the event that an area of the plant must be evacuated the following procedure will be used.

- a. The Plant Manager or his designated representative will give command to evacuate.
- b. The partial evacuation command will be given by word of mouth. This will minimize confusion in other areas of the plant, that is not affected.
- c. The routes of evacuation will be predetermined exits. Alternate routes may be necessary, dependent upon the nature of the emergency.

IV. DISASTER CONTROL PROCEDURES (continued)

A. TYPES OF EVACUATION (continued)

2. Total Evacuation

When an emergency of sufficient intensity occurs and a total evacuation of the plant is deemed necessary, the following procedure will be used.

- a. The Plant Manager or his designated representative will give command to evacuate.
- b. Plant Security will activate the TOTAL EVACUATION ALARM, upon order of the executive in command.
  - \* The TOTAL EVACUATION ALARM will be the sounding of the plant siren for four 15 second blasts, with 5 second intervals.
  - \* The ALL-CLEAR signal will be a single 15 second blast of the plant siren.

3. NON-EVACUATION TAKE SHELTER

When an emergency arises, such as a tornado, and shelter is required for the protection of the employees, the following procedures will be used.

- a. The Plant Manager or his designated representative will give command to TAKE-SHELTER.
- b. Plant Security will activate the TAKE-SHELTER signal, upon order of the executive in command.
- c. All employees, except key personnel will immediately seek shelter in their predetermined shelter area. Plant layouts will be made available indicating the shelter areas for different sections of the plant.
- d. The TAKE-SHELTER signal will be a series of 2 second blasts of the plant siren, with 2 second intervals. This will be continued for a duration of one minute.
- e. The ALL-CLEAR signal will be a single 15 second blast of the plant siren.

IV. DISASTER CONTROL PROCEDURES (continued)

B. METHODS OF EVACUATION & RESPONSIBILITIES

1. Methods of Evacuation

- a. The type of evacuation will determine which routes will be taken. The person assigned the responsibility in each area will determine this and react accordingly.
- b. A plant layout indicating the evacuation routes for each type of emergency will be made available to line supervisors for production areas, and to persons responsible in other areas.

2. Responsibilities

- a. The line foreman will be responsible for the employees under his supervision. He should also see that people that ordinarily do not work in his area, such as skilled trades, are assisted to the proper area of safety.
- b. The foreman should appoint two employees to act as his assistants. These employees should be group leaders, such as trainers or utility workers. It will be the foremans responsibility to instruct these assistants in the groups evacuation procedures.
- c. Department Superintendents are to maintain contact with the Disaster Control Center and are responsible for keeping the Control Center informed, as to the conditions in his areas. He will also direct the activities of his supervisors.

C. COMMUNICATIONS

- a. DO NOT CALL THE PLANT SECURITY OFFICE (DISASTER CONTROL CENTER) unless you have pertinent information for the coordinator. Keep the phones open for emergency purposes. This is imperative in time of disaster.

## V. RULES &amp; GUIDE LINES FOR ORDERLY EVACUATION

- A. Total evacuation means everyone except key personnel such as plant security and fire brigade.
- B. Each employee will exit by his pre-determined route. The area foreman will supervise his employees for a safe and orderly evacuation. The foreman will check his entire area, including rest rooms, to assure total evacuation.
- C. Persons on upper levels must use the stairways and not the elevators. (AVOID ELEVATORS)
- D. WALK - DO NOT RUN. Smoking will not be permitted during the entire evacuation.
- E. When evacuation is necessary, turn off your machines, lay down your tools and stock, and proceed to your exit in an orderly manner. DO NOT SHOVE OR PUSH.
- F. Tractor Drivers : Park your tractors off of the main aisles. DO NOT attempt to drive them to an assigned exit.
- G. Do not delay your exit by going to your locker, restroom, coffee machine, punching out time card, etc. Go directly to your prescribed exit.
- H. Total evacuation means to leave the building. Go to your predetermined area outside of the building and await further instructions. Do not block the streets or plant exits. DO NOT GO HOME!!! Your supervisor will instruct you to leave premises if necessary.
- I. Maintenance department will arrange for a supervisory shut-down of conveyors, and restarting after the ALL-CLEAR is sounded.
- J. The ALL-CLEAR signal will be a re-sounding of the plant siren, as well as verbal instructions from members of management.
- K. After the ALL-CLEAR signal, proceed immediately back to your operation. DO NOT DELAY!!!
- L. Safety of the employee is the main concern. Under these circumstances, good judgement is essential.

VI. EVACUATION ROUTES BY PLANT AREAS

(\*) **AREA A**

Chassis Department 25 : Columns 1 to 12, A to H and columns 12 to 20, A to V. Proceed to the emergency exit at Post # 2. Main employes entrance. Proceed to the north hourly parking lot, across Stadium Drive, and wait further instructions from management.

(\*) **AREA B**

North Motor Line & Material Storage : Proceed to the emergency door at column 1 H, 1st floor. Exit into the west yard and await further instructions from management. In the event it is necessary, be prepared to move out of the company car garage gate, but not before instructed too.

(\*) **AREA C**

South Motor Line , Maintenance, Tooling & Salvage : Columns 1 to 14, ZA to ZU, 1st floor. Proceed to the extreme south end of the building and exit through emergency door at column 2 ZU. Proceed to the old frame pad area and await further instructions from management.

(\*) **AREA D**

Repair Department : Columns 14 to 20, V to ZR, 1st floor. Proceed to the south end of the building and exit through the emergency exit at columns 15 ZM. Assemble in the repair yard and await further instructions from management.

VI. EVACUATION ROUTES BY PLANT AREAS : (continued)

(\*)

## AREA E

Trim - Department 17 : Columns 20 to 44, A to M. Evacuate the plant through Post # 7 at column 44 A. (Front employees entrance to body division). Proceed to the north end of hourly parking lot, east of the plant, and await further instructions from management.

(\*)

## AREA F

Body Shop and Material unloading (North end) : Columns 20 to 44, M to Y and columns 29 to 43 Y to ZHX. Proceed to emergency exit at Post # 6 located at columns 39 ZHX. Exit the plant and proceed to the yard area south of Post No. 6. DO NOT assemble in the street. Await further orders from management.

(\*)

## AREA G

Body Shop and Material unloading (South end) : Columns 20 to 28, Y to ZTX and columns 28 to 35, ZHX to ZTX. Proceed to the south end of the body assembly building and exit through the emergency exit at column 24 ZTX. Assemble in the yard outside the south wall and await further orders from management. DO NOT go to Post # 6 area.

(\*)

## AREA H

Department 21, Trestle Area & Chassis Body Bank : Evacuate the plant through stairwell located at column 3 J, 2nd floor. Upon arriving on the 1st floor proceed to the emergency exit at column 1 H and assemble in the yard west of the main building.

VI. EVACUATION ROUTES BY PLANT AREAS (continued)

(\*)

## AREA J

Department 19, Small Paint Mix, Mast Jacket Spray Booth Booth, Flo-Coat Area & Blu Surf Operator, 2nd floor : Proceed directly to the emergency exit and stairwell at column 1 M, 2nd floor. Upon exiting the main building at the yard level, proceed to the yard west of the main building.

(\*)

## AREA K

Basic Paint & Office, Conveyor House and Maintenance Area at Columns 14 Z and lower bonderite, 2nd floor : Proceed directly to emergency exit and stairwell at column 1 ZF. Upon exiting the building at the yard level, proceed to the yard west of the main building. (note: Personnel at work should exit the stairwell at 02 ZA in paint repair and exit into the yard. Avoid use of the hallway between paint mix and main building by any personnel.)

(\*)

## AREA L

Paint Repair & Elpo Area ,2 floor : Proceed to stairwell at column 10 ZU, 2nd floor. Upon arriving on the first floor proceed to the emergency exit at column 12 ZV and exit into the yard south of the maintenance building with other pedestrian traffic.

(\*)

## AREA M

Maintenance & Engineering Offices, 2nd floor : Proceed directly to the outside stairtower at column 8 ZW & exit into the yard south of the maintenance building with other traffic. Avoid use of the inside stairwells. A responsible representative should be instructed to check the toilets & locker rooms on this mezzanine to ascertain that they are indeed evacuated.

VI. EVACUATION ROUTES BY PLANT AREAS (continued)

(\*)

## AREA N

Cushion Room, Water Test, Office Area "B" & Foam Storage Building, 2nd Floor : Proceed to the stairwell at column 44 AX and go to the first floor. DO NOT exit the outside at the stairwell, but go to the emergency exit at Post # 7. Assemble in the north end of the hourly parking lot (Lot # 2) and await further instructions from management.

(\*)

## AREA P

Seat Cover Storage, Truck Return Operator, Conveyor House and Lower Trim Annex from Columns Y north : Proceed to the stairwell at column 41 MX and go to the first floor. Proceed north to the emergency exit at Post # 7 and assemble in the north end of hourly parking lot (Lot # 2) and await further instructions from management.

(\*)

## AREA Q

Trim Annex from columns Y south, Upper Bonderite, and Head-Liner Storage : Proceed to stairwell at column 38 ZE, 2nd floor and exit on the first floor. DO NOT go outside at the bottom of the stairtower, but proceed to the emergency exit at Post # 6. Assemble in the yard south of Post # 6. DO NOT assemble in the street.

(\*)

## SPECIAL AREAS

Special areas as truck dock, powerhouse, paint mix building, baler room, battery room & fire crib will proceed to the nearest outside door in those areas and group with other pedestrians to await further instructions from management.

## VI. EVACUATION ROUTES BY PLANT AREAS (continued)

(\*) **OFFICE AREA A**

2nd floor, Cafeteria Hallway West : Proceed west in office hallway to the stairwell at the west end, adjacent to the large conference room. Go to the first floor and exit with other plant traffic at Post # 2. DO NOT GO TO THE LOBBY. Assemble in salary parking lot and await further instructions.

(\*) **OFFICE AREA B**

2nd floor, Cafeteria Hallway East : Proceed east toward and through traffic department. Go into the cushion room assembly shop via pedestrian door at column 41 A. Continue east to stairtower located at column 44 A and exit the building with other plant traffic at Post # 7. DO NOT go to the lobby. Assemble in salary parking lot & await instructions.

(\*) **OFFICE AREA C**

Managers Office West : Proceed west through the office aisle to Post # 2, and exit with other plant traffic at that location. DO NOT attempt to exit through Lobby. Assemble in salary parking lot across from Post 2 and await further instructions.

(\*) **OFFICE AREA D**

Medical Department East : Go to the main plant aisle and proceed east and exit at Post # 7 with other pedestrian traffic. note : During office hours an acceptable alternate exit would be through the personnel office door. Assemble in salary parking lot and await further instructions.

D. CONTINGENCY PLAN DISTRIBUTION

A copy of the Contingency Plan will be kept at the following locations in the plant:

1. Plant Security Office
2. Maintenance Office
3. Plant Engineering Office
4. Safety Office

E. Amendments:

The contingency plan must be reviewed, and immediately amended, if necessary, whenever:

1. Applicable regulations are revised.
2. The plan fails in an emergency.
3. The facility changes; in its design, construction, operation, maintenance, or other circumstances; in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous constituents, or changes the response necessary in an emergency.
4. The list of emergency coordinators changes.
5. The list of emergency equipment changes.

F. COMMUNICATIONS OR ALARM SYSTEM:

The following communications and alarm systems are available at the GM -Leeds Plant for use during emergency situations:

1. Telephone
2. Plant Security two-way radios
3. Maintenance two-way radios.
4. Evacuation siren system.
5. Fire Alarm system.
6. Sprinkler Water Flow alarm system.

G. EMERGENCY EQUIPMENT:

GMAD-Leeds is adequately equipped with fire protection and emergency equipment, through the guidance of Industrial Risk Insurance (I.R.I.), and GM Corporate Plant Protection Policy. One Plant Security Officer is designated as the Plant Fire Marshall. He is responsible for insuring that the plant's program and equipment for fire protection, disasters, evacuations, and general facility protection are followed. Regularly scheduled inspections are made on all fire equipment and fire alarm boxes. The Maintenance Department is responsible for spill clean-up and keeps on hand adequate supplies of floor dry, sorbent pads, sand, etc.

1. Mobile Equipment:

The following is a list of Mobile Equipment that can be used in the event of fire, explosion or other emergency:

- a. Fire Trucks - Each fire truck is equipped with its own water supply and hoses, dry chemical and CO<sub>2</sub> extinguishers, self contained air packs, and miscellaneous tools.

Location: Column 3A 1st floor  
Column 43A 1st floor

- b. Transport Vehicles - These vehicles carry extra extinguishers, Air Packs, and are capable of stretcher transport.

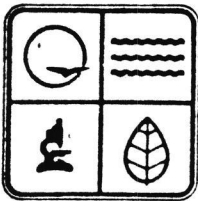
Location: Column 3A 1st floor

2. Sprinkler System:

The sprinkler system is piped throughout the plant to supply automatic water fire protection. It also serves as an alarm system; for when a sprinkler head is discharged, a water flow meter is energized sending a signal to the plant security offices. The fire sprinkler system is pressurized from the plant City water supply. A back-up system is provided through a storage tank and diesel pumps. Fire hoses are also connected to this system throughout the plant.

3. Extinguishers:

Three types of extinguishers are also stationed throughout the plant in addition to the fire hoses. These include water, carbon dioxide, and dry chemicals and are maintained and inspected on a scheduled program.



AMT  
R. H. Stewart

April 4, 1983

EPA-ARWM/PMTS

APR 11 1983

Region VII K.C., MO

Mr. Larry N. Pemberton  
Plant Engineering  
GM Assembly Division-Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

RE: GMAD Leeds Plant - Storage Facility Permit Application

Dear Mr. Pemberton:

The Department of Natural Resources has conducted a completeness review of the GM Assembly Division Leeds Plant hazardous waste storage permit application.

The department has determined that the application is complete in accordance with 10 CSR 25-8.010(1)(B). The department in its review has found some deficiencies in the application and offers the following comments:

1. In accordance with 10 CSR 25-7.011(2)(C)2. the engineering plans and reports shall be submitted by a registered professional engineer licensed by the state of Missouri. Form SCT item 4 is designated for this purpose and should be completed.
2. It is not apparent that the maps which were provided meet the criteria of 10 CSR 25-7.011(2)(C)2.A.(I) and (II), specifically;
  - A. Does Figure 4 depict the surface extending one mile beyond the property boundary?
  - B. Are there any major rock outcrops or sinkholes within one mile of the property boundary?
  - C. Page B-7 explains a security fence around the facility but the fence is not shown on drawings on page 3, 4, 5 or 6. Is the fence along the property boundary? Are all the gates shown on the drawings? Please address these items.
3. The department anticipates that Mr. J.E. Daniels will not be signing manifests and reporting forms. The requirements of 10 CSR 25-7.011(2)(C)3.B. are designed to allow Mr. Daniels to delegate his authority to the person(s) involved in the day-to-day reporting requirement. To accomplish this end the department is requesting that a letter be submitted authorizing positions and/or persons to sign reporting forms in lieu of Mr. Daniels.

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
Jefferson City, Missouri 65102 (314) 751-3241  
1915 Southridge Drive  
P.O. Box 1368

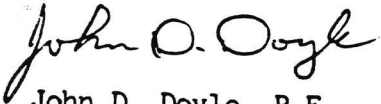
4. Please address the notification requirements of 10 CSR 25-7.011(3)(B)3.
5. While the waste analysis plan specifies the test parameter it is not clear how the samples were taken. Please address this matter regarding compliance with 10 CSR 25-7.011(3)(C)4.C.
6. The section entitled "Procedures to Prevent Hazards" does not address any arrangements with local authorities as required by 10 CSR 25-7.011(4)(G). Similarly the contingency plan will apparently not describe arrangements with local authorities or be submitted to local authorities as required by 10 CSR 25-7.011(5)(C)3 and (D). Please address the need or lack of need for off site assistance regarding the above referenced regulations.
7. The "GMAD Leeds Contingency Plan and Emergency Procedures" should contain the names, addresses, and telephone numbers of all persons qualified to act as the emergency coordinator in accordance with 10 CSR 25-7.011(5)(C)4.
8. Although the drum storage area is discussed in sections D and F the aisle space requirements of 10 CSR 25-7.011(4)(F) need to be addressed.
9. Several items of recordkeeping and reporting are contained in the application but some items are missing. Please develop a list of records which will be retained at the facility and retention term required by 10 CSR 25-7.011(6)(B). I have attached a monthly report format, please discuss this and other reports required under 10 CSR 25-7.011(6)(C). Response to this comment will aid in compliance with 10 CSR 25-7.011(7)(C)6.
10. A separate letter will be sent to your attention concerning compliance with 10 CSR 25-7.011(8), the financial assurance mechanism.
11. The department would like further clarification concerning the lack of need for decontamination of the facility. Spills and leaks over the time of operation may require testing before one can determine that there is no need for decontamination. Please note the deadline required in the closure section 10 CSR 25-7.011(9)(C).
12. While section F discusses management of waste in containers certain requirements of 10 CSR 25-7.050(3) have not been discussed adequately. Please address the following items 10 CSR 25-7.050(3)(B), (C), and (E). In addressing these items please consider the types of waste stored such as caustic sludge and their effects on the containers and container handling.

Mr. Pemberton  
Page 3  
April 4, 1983

I would urge you to consider both the Environmental Protection Agency, Region VII and the Department of Natural Resources comments before preparing your response to these comments. The department would appreciate your response to these comments on or before May 13, 1983.

If you have any questions, please contact Mr. Joe Jansen of this office.

Sincerely,



John D. Doyle, P.E.  
Chief  
Technical Services Section  
Waste Management Program

JDD:JJ:gh

Enclosure

cc: Ms. Karen Flournoy, EPA Region VII ✓  
Kansas City Regional Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

APR 07 1983

Mr. Larry N. Pemberton  
Plant Engineering  
GM Assembly Division-Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

EPA I.D. No: MOD000822668

Dear Mr. Pemberton:

We have reviewed the Resource Conservation and Recovery Act (RCRA) Part B permit application received on February 22, 1983, for the Leeds Plant. The following comments result from a completeness review. A completeness review determines if all requirements have been addressed in the permit application.

Facility Location Information (264.18(b) and 122.25(a)(11))

1. If you do not plan to provide the information required in Section 122.25(a)(11)(iv)(A) and (B) the application should state this and indicate that the requirements of 122.25(a)(11)(iv)(C) are included. With regard to the 122.25(a)(11)(C) requirements, please provide the following additional information:

- A. Timing of waste movement relative to flood levels. How is minor flooding distinguished from major flooding?
- B. Please include additional information on the area in the Paint Mix Building where the drums will be stored. It seems that it could be impossible for a transporter to reach the facility during a major flood. Are there any written plans for waste removal during flooding? At what point will the fork lifts be activated?
- C. Does the temporary closure of the fourth side of the drum storage facility prevent flood water from entering the facility?
- D. The application should address the potential for accidental discharges of waste during movement (122.25(a)(11)(iv)(C)(4)).

Chemical and Physical Analyses and Waste Analysis Plan  
(264.13(a), 122.25(a)(2) and 264.13(b), (c) and 122.25(a)(3))

2. Based upon our review of the sampling methods contained in Table C of Section C, it appears that the sampling methods listed in Table C do not meet the requirements outlined in Appendix I of Part 261. We request that you review Table C in conjunction with the Part 261, Appendix I requirements and revise Table C as appropriate. Attached for your use in this evaluation is a copy of Section One - Sampling of Solid Wastes from "Test Methods for Evaluating Solid Waste-Physical/Chemical Methods." Subsections 1.2 and 1.4 contain information on sampling equipment and methodology.

Security (264.14 and 122.25(a)(4))

3. How many "Danger-Unauthorized Personnel Keep Out" signs are posted at the drum storage area and where are these signs located?

General Inspection Requirements (264.15 and 122.25(a)(5))

4. Section F-2b(1) of the permit application indicates that the container storage area is inspected weekly. Does this mean that the structure and containment system are inspected or only that the containers are inspected? The type of problems section of the application addresses inspection of containers only. In accordance with 264.174, the containers and containment system must be inspected weekly.

Preparedness and Prevention Requirements (Part 264, Subpart C)

5. Since a waiver of the preparedness and prevention requirements was not requested, the application needs to address water at adequate volume to supply fire equipment (264.32(d)). The remaining items under required equipment have been included in the application.
6. Are the internal communication/alarm systems, devices for summoning emergency assistance and sprinkler system tested and maintained to assure operation during an emergency? (264.33)
7. How much aisle space is maintained in the drum storage area? The application states that sufficient aisle space is allowed. How was the sufficient aisle space determined?
8. Have any arrangements been made with local authorities? (264.37)

Requirements for Ignitable, Reactive or Incompatible Wastes (264.17, 264.176 and 122.25(a)(9))

9. All requirements regarding the handling of ignitable waste as contained in 264.17(a) - (c) must be specifically addressed in the permit application. The 264.176 requirement is addressed in Section F-5c of the application.
10. How many "No Smoking" signs are posted at the drum storage area and where are these signs located?

Contingency Plan (Part 264, Subpart D and 122.25(a)(7))

11. The names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator must be included. In the emergency coordinator list (Section G, page 11), is the primary coordinator the first person listed for a certain 8 hour shift?

Personnel Training (264.16 and 122.25(a)(12))

12. On what schedule is the training program given?

Closure Plan (Part 264, Subpart G and 122.25(a)(13))

13. The closure plan section of the application should be revised to include the following information:

- A. An estimated date of closure (year);
- B. Description of steps needed to decontaminate facility equipment. Decontamination of the drum storage area containment system, including the sump, should be included in the closure plan.
- C. Certification of closure by the owner and an independent registered professional engineer should be included in the application. Certification by the engineer should include one or more site visits during closure.
- D. The closure plan should include a detailed closure cost estimate (by line item). The cost estimate should include the cost of removing the drums to a disposal or recycling facility, decontamination costs and certification costs.

Financial Requirements (Part 264, Subpart H and 122.25(a)(15) and (a)(17))

14. We will review the updated financial test information when received from the General Motors corporate office.

Manifest System, Recordkeeping and Reporting (Part 264, Subpart E)

15. The application should indicate that all recordkeeping and reporting requirements will be met. You should also be aware that the permit will contain conditions covering such portions of the regulations as Availability, Retention and Disposition of Records (264.74) and Conditions Applicable to All Permits (122.7).

Other Federal Laws (122.12 and 122.25 (a)(20))

16. The application should address compliance with the Federal Laws listed in 122.12.

Engineer Certification (122.25)

17. Section 122.25 requires that certain technical data, such as design drawings, specifications and engineering studies, shall be certified by a registered professional engineer. For this application, at a minimum, design drawings for the containment system shall be certified.

Container Standards (Part 264, Subpart I and 122.25(b)(1))

18. The application should demonstrate that the containment system must have sufficient capacity to contain 10 percent of the volume of containers or volume of the largest container, whichever is greater. Does the sloped access side and the curb provide sufficient containment capacity? Documentation of compliance with this requirement should be included in the application.

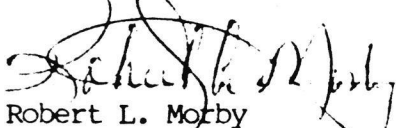
19. Does the containment system capacity allow for precipitation blowing into the open side?

20. All requirements for the containment system outlined in 122.25(b)(1) and 264.175 must be specifically addressed in the permit application.

If any of the information required in this letter is not applicable you will need to state that fact in your response and explain why. For information requested where your operation differs from the regulatory requirement you may submit a waiver request justifying your operation. We will review the request and advise you of any comments or approval/disapproval.

Please provide a response to this letter by May 20, 1983. Failure to furnish the requested information on time could result in an enforcement action. If you have any questions, please contact Karen A. Flournoy of my staff at (816) 374-6531. Also, please provide our office with a copy of your response to the Missouri Department of Natural Resources (MDNR) application review letter. A copy of your response to this letter should be sent to MDNR.

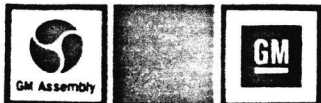
Sincerely yours,



Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

Enclosure

cc: Joe Jansen, MDNR



**GM Assembly Division**

**General Motors Corporation**

May 12, 1983

*KLM*  
*Daniel*  
*R. Steward*  
*H. Fleury*  
**Leeds Plant**  
6817 Stadium Drive  
Kansas City, Missouri 64129

Mr. Robert L. Morby  
Chief, Waste Management Branch  
U.S. Environmental Protection Agency, Region VII  
324 East Eleventh Street  
Kansas City, Missouri 64106

**EPA-ARWM/WMBR**

**MAY 23 1983**

**Region VII K.C., MO**

Re: GMAD-Leeds Plant RCRA Part B Permit Application

Dear Sir:

Our reply to the questions/comments in your letter of April 7, 1983, is as follows:

1. Flood proofing and flood protection measures /40 CFR Sec. 122.25(a)(11)(iv)(A) and (B)/ do not apply to this facility. The requirements of the flood plan /40 CFR Sec. 122.25(a)(11)(iv)(C)/ are included in the application in Section B, Page 10.
1. A&B Minor flooding is considered to be a depth of 12 inches or less. Major flooding is considered to be more than 12 inches. You will note on the flood plain map that the storage area lies within the floodway fringe and not in the floodway. We anticipate that upon receiving a flood level warning from the Corps of Engineers we would proceed as follows:
  1. Call the local disposal/reclaim facilities and have them pick up solvents, paints, and oils, and remove them from plant site to their facilities. This could be accomplished in 2 to 4 hours.
  11. Based upon predicted flood elevations, we would decide whether to secure the open side of the storage facility or to relocate the stored materials to temporary storage inside the adjacent paint mix building. The floor elevation of the paint mix building is several feet higher than the storage area. The floor of the paint mix building is accessible by ramp from the yard area so transport of drums can be easily accomplished by fork trucks.
1. C No.
1. D There is a potential for accidental spillage when moving the drums from the storage facility to temporary storage at the mix building, or when loading them into trucks for removal to off-site disposal/reclaim facilities. The plant emergency coordinator will follow these operations to insure that all necessary precautions are taken to avoid an accidental spill.

2. The regulations define a representative sample as one which exhibits the average properties of the whole.

The regulations also state the sampling method(s) to be used to obtain a representative sample as follows:

(264.13) General Waste Analysis (b)(3)

The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either: (i) one of the sampling methods described in Appendix I of Part 261 of this chapter; or ---  
(ii) an equivalent method.

Due to the excellent segregation of our waste streams we feel that the sample methods and samples obtained meet the requirements of the regulations. (Equivalent method).

3. Two signs are posted at the open (access) side of the storage facility. One sign is posted on the west side of the facility (faces access aisle or road). The other sides of the facilities are closed to approach access.
4. The supervisor does the weekly inspection of the facility. His inspection includes the containers and the facility area, including the containment facility.
5. The fire protection system for this area is provided by hydrants fed from the (10") main fire sprinkler loop which is the fire protection water source for the plant. The fire sprinkler loop is fed from city water mains at a residual pressure of 150 P.S.I.
6. Internal communication/alarm systems are a part of the plant systems which are maintained at a constant state of readiness 24 hours/day.
7. The aisle space allowed in the storage facility is sufficient to allow for access to the area as required for inspection, spill control, fire control, etc. This facility has been in operation since 1974 and present space allowances and aisle access have been shown to be sufficient.
8. The Leeds Plant has reviewed the Contingency Plan and the regulation (265.53) and we have determined based on our in-plant organization and capabilities that it is not necessary to submit our plan to agencies outside the facility.

If outside medical assistance should be required, the request for assistance will be handled by the Plant Medical Director. He will be most knowledgeable about the type and quantity of assistance that will be required. He will also know which medical facility to contact to obtain the medical assistance best suited to the emergency.

Plant Security personnel are trained to handle most emergencies that might occur under the Contingency Plan. If the occasion should arise where the Plant Security personnel need assistance from local police, the Chief of Plant Security will call the local police department and arrange for additional assistance.

The local fire departments that service the Leeds Plant are invited into the plant and are taken on supervised tours of the facility where the potential fire and/or explosion hazards exist, (i.e., paint mix rooms and storage, propane, waste storage, foam storage, etc.) . They are shown how our fire protection systems operate and where the access to plant gates and other entry areas are located. This existing fire security program would not be improved upon by the submission of our Contingency Plan to the department.

The determination of whether to call in additional state and local emergency response teams will be made by the Plant Engineer on a case-by-case basis as determined by the circumstances.

In summary, it has been determined that most emergency situations that might arise involving RCRA permitted facilities can be handled by plant personnel. A severe fire emergency could be an exception to this. We are satisfied that additional help in this area is adequately planned and provided for in the existing fire programs with the City fire companies.

9. The Leeds Plant is aware of the requirements of 264.17 and has taken precautions that no ignition sources are allowed in the storage area. No smoking is allowed in the storage area, and the area is posted to keep all unauthorized persons out.
10. One "No Smoking" sign is posted at the access side of the storage area.
11. One of the Emergency Coordinator/Back-up Coordinators will be on duty at the plant site at all times. The in-plant phone numbers are listed for these persons. Home addresses are personal information and will not be listed in the Contingency Plan.

The Emergency Coordinator (Section G, Page 11, Permit Application ( is the Maintenance General Supervisor that is assigned to a particular work shift, (3 shifts; 3 supervisors). These people rotate shift assignments on a periodic basis.

12. Training is begun for new operator when he is assigned to the waste storage area. He will work with an experienced operator while being trained by his supervisor and the already-trained operator. It is anticipated that annual update training and procedural information will be presented to those personnel involved with the handling, storage, and shipment of wastes.
13. A. An estimated date of closure is not possible since the storage facility exists for the purpose of handling the Leeds Plant wastes. As long as the plant continues to operate in the production of automobiles the storage facility will continue to be used.
- B. Decontamination of the storage facility will consist of a thorough cleaning of the concrete area and sump.
- C. (265.115) Certification of closure will be complied with by the Leeds Plant.
- D. The lump sum cost estimate included in the Permit Application takes into account anticipated costs for disposal of stored wastes, clean-up costs, and certification costs.

14. (Updated financial test.)
15. The Leeds Plant anticipates that the following records will be kept on file:
1. Copies of manifests.
  2. Records of waste analyses.
  3. Monthly reports.
  4. Inspection records.
  5. Closure estimates.
  6. Permit application, plans, operations manual (called Hazardous Waste Procedures at Leeds)
  7. Job title and description for personnel.
  8. Records of job experience and training (personnel records).

All record keeping and reporting requirements will be met.

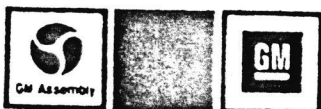
16. The Leeds Plant is believed to be in compliance with federal laws as listed in 122.12.
17. A copy of the certified design drawing for the facility is enclosed.
18. The containment system (sump pit) will contain a volume of approximately 500 gallons. Normal operations will find maximum volumes of stored liquids of approximately 4,000 gallons. The sloped access and curb provides containment for spills and/or leaks. The sump contains adequate volume for the storage facility.
19. Precipitation blowing into open side has not proved to be a problem for the nine years this facility has been in use.
20. All requirements for containment (264.175) are complied with as follows:
- (a)(1) The facility is constructed of reinforced, impervious, concrete which will contain leaks and spills.
  - (2) The concrete slab is pitched to drain spills to a central drain trench and holding sump.
  - (3) The sump holding capacity exceeds 10% of the maximum volume of liquids stored.
  - (b) Run-on to the containment area is prevented by a roof and gutter drainage system.
  - (c) Sumps are inspected weekly and will be pumped out as required.

We are including as a separate attachment our replies to the MDNR comments/questions.

J. E. Daniels, Director  
Plant Engineering

By   
L. N. Pemberton  
Plant Engineering

NCC 6 1/2 10-



GM Assembly Division

General Motors Corporation

May 12, 1983

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

RECEIVED

MAY 16 1983

WASTE  
PERMIT PROGRAM

Mr. John D. Doyle  
Chief, Technical Services Section  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 South Ridge Drive  
Jefferson City, Missouri 65102

Re: GMAD-Leeds Plant Storage Permit Application

Dear Sir:

Our reply to the questions/comments in your letter of April 4, 1983 is as follows:

1. A revised form SCT is attached and has been completed as requested.
2. A. The map in Figure 4 does not depict the surface extending one mile beyond the property boundary. The Leeds Plant does not have a map that extends one mile beyond the property boundary.  
B. To the best of our knowledge, there are no major rock outcrops or sink holes within one mile of the property boundary.  
C. A copy of Figure 1, Page 3 (revised) is enclosed. This map shows location of fence lines, plant security station and gate locations. As previously stated in the Permit Application, there is no access to the waste storage area from off-site without going through a plant security station.
3. The requested letter is enclosed.
4. Before transferring ownership or operation of the storage facility, the Leeds Plant will notify the new owner/operator in writing of the requirements of the General Rules for All Hazardous Waste Facilities (10 CSR 25-7.011).
5. Table C, Section C, Page 21 of the Permit Application indicates the methods used to sample wastes.

6. The Leeds Plant has reviewed the Contingency Plan and the regulation (265.53) and we have determined based on our in-plant organization and capabilities that it is not necessary to submit our plan to agencies outside the facility.

If outside medical assistance should be required, the request for assistance will be handled by the Plant Medical Director. He will be most knowledgeable about the type and quantity of assistance that will be required. He will also know which medical facility to contain to obtain the medical assistance best suited to the emergency.

Plant Security personnel are trained to handle most emergencies that might occur under the Contingency Plan. If the occasion should arise where the Plant Security personnel need assistance from local police, the Chief of Plant Security will call the local police department and arrange for additional assistance.

The local fire departments that service the Leeds Plant are invited into the plant and are taken on supervised tours of the facility where the potential fire and/or explosion hazards exist (i.e., Paint Mix Rooms and storage, propane, waste storage, foam storage, etc.). They are shown how our fire protection systems operate and where the access to plant gates and other entry areas are located. This existing fire security program would not be improved upon by the submission of our Contingency Plan to the department.

The determination of whether to call in additional state and local emergency response teams will be made by the Plant Engineer on a case-by-case basis as determined by the circumstances.

In summary, it has been determined that most emergency situations that might arise involving RCRA permitted facilities can be handled by plant personnel. A severe fire emergency could be an exception to this. We are satisfied that additional help in this area is adequately planned and provided for in the existing fire programs with the City fire companies.

7. One of the Emergency Coordinator/Back-up Coordinators will be on duty at the plant site at all times. The in-plant phone numbers are listed for these persons. Home addresses are personal information and will not be listed in the Contingency Plan.
8. The aisle space allowed in the storage facility is sufficient to allow for access to the area as required for inspection, spill control, fire control, etc. This facility has been in operation since 1974 and present space allowances and aisle access have been shown to be sufficient.

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MAY 16 1983

WASTE  
MANAGEMENT PROGRAM

Mr. John D. Doyle  
May 12, 1983  
Page 3

9. The Leeds Plant anticipates that the following records will be kept on file:

1. Copies of manifests.
2. Records of waste analyses.
3. Monthly reports.
4. Inspection records.
5. Closure estimates.
6. Permit application, plans, operations manual (called Hazardous Waste Procedures at Leeds).
7. Job title and description for personnel.
8. Records of job experience and training (personnel records).

The monthly reporting format has been revised to fit the requirements of the Leeds facility. A copy is included for your review.

- 6(C)1.B - Closure estimates will be submitted annually.  
6(c)1.C - Will notify the department in the event of closure.  
6(C)1.E - Will notify the department in advance of any planned alterations or additions to the facility.

10. The letter received May 2, 1983, from your office on the subject of Financial Requirements, has been forwarded to our Central Office. As soon as we receive direction on how to proceed, we will reply.
11. When closing the facility, we anticipate that all stored materials (drums) would be removed to disposal/reclaim facilities (off-site). Once this is accomplished, the storage area and sump pit would be thoroughly cleaned. We do not believe that any further testing would be required when clean-up is completed. What would remain, would be a steel and concrete (slab) structure. We don't believe that any rational means of testing would apply.

We anticipate that we will be able to meet the notification, disposal, and closure deadlines as stipulated in (9) (C) 1.A.B.C.2.

12. (B) If a container is found to be leaking or for some other reason is determined to be unsuitable for storage or shipment, the contents (waste) will be transferred to another container that has been inspected and verified to be suitable for the waste to be contained.

(C) The containers (drums) used to store/ship caustic sludge are the same containers that we receive the virgin caustic soda in. These are D.O.T. specification drums with plastic inter-liner and clamp-on, gasketed lids.

(E) All containers containing wastes are kept covered during storage and shipment.

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MAY 16 1983

WASTE  
MANAGEMENT PROGRAM

LNP/ef

Enc.

J. E. Daniels, Director  
Plant Engineering

By L. N. Pemberton  
L. N. Pemberton  
Plant Engineering

STORAGE FACILITY

1. Did the department conduct a preliminary site investigation? ☒ Yes ☐ No
2. Any application for a hazardous waste storage facility must include the following information:

- A. General Rules Applicable to all Facilities  
 B. Storage in Containers and/or  
 C. Storage in Tanks

As Required By

10 CSR 25 7.011

10 CSR 25 7.050(3)

10 CSR 25 7.050(4)

MAY 16 1983

3. List the type(s) of storage to be utilized at the facility.

WASTE  
MANAGEMENT PROGRAM

Above Ground Tanks		Containers		Underground Tanks	
Number	Capacity	Number	Capacity	Number	Capacity
0		225	55 Gallons	0	

4.

Engineer's Certification

This is to certify that this application has been prepared to comply with the Missouri Missouri Hazardous Waste Management Law and all applicable standards, rules, and regulations for hazardous waste storage facilities, specifically 10 CSR 25 7.050. It is my understanding that this facility has been designed to provide adequate protection of the health of humans, and other living organisms.

Registered Professional Engineer Submitting Plans

Name Jerome E. Daniels Phone 913/281-7390

Name of Consulting Firm GM Assembly Division-Leeds Plant

Address 6817 Stadium Drive

City Kansas City State Missouri Zip Code 64129

Signature Jerome E. Daniels Registration No. 13925 CAL Date 2-21-83

5.

Applicant's Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Operator Signature \_\_\_\_\_ Date \_\_\_\_\_

Land Owner Signature \_\_\_\_\_ Date \_\_\_\_\_

Owner (other) Signature J.E. Daniels Date 2-21-83  
Director-Plant Engineering

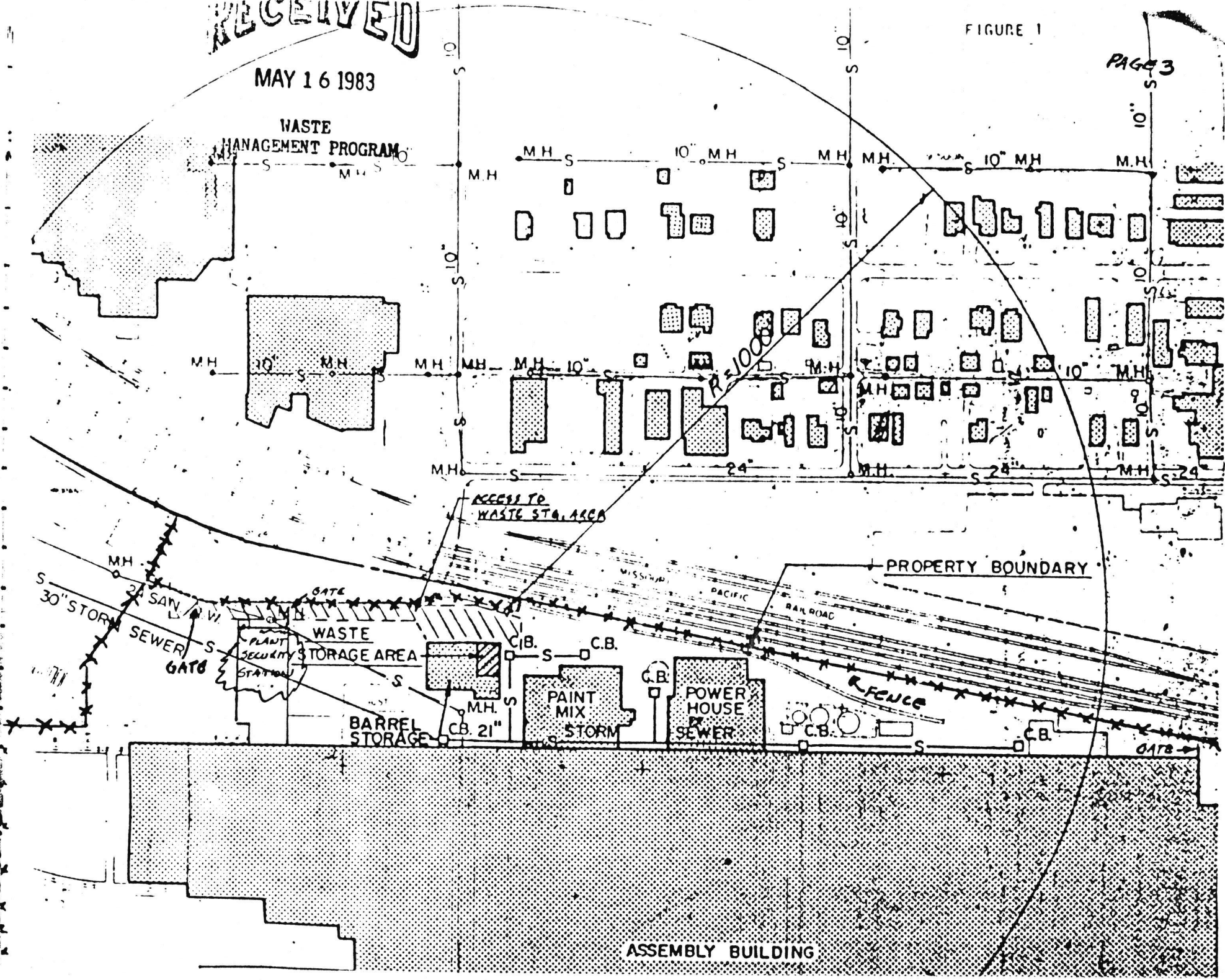
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MAY 16 1983

FIGURE 1


PAGE 3

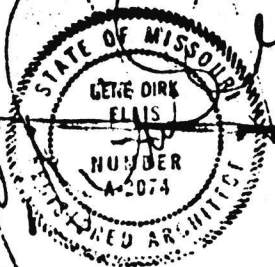
WASTE  
MANAGEMENT PROGRAM

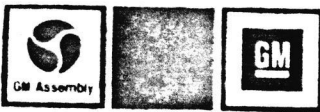


Section of Cd. R.

Miller - structure

	<b>LINCOLN</b> 460 DONOVAN ROAD • KANSAS CITY	
	SCALE <i>1/8" = 1'-0"</i>	APPROVED BY  
DATE  		
JOB NAME <i>Carrel Storage</i> <i>E.M. Assembly Division</i>		
ARCHITECT  		
CONTRACTOR <i>Miller - Stucki</i>		





GM Assembly Division

General Motors Corporation

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

April 12, 1983

RECEIVED

MAY 16 1983

WASTE  
MANAGEMENT PROGRAM

Mr. John D. Doyle  
Chief, Technical Services  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Re: Authorizing Signatures for Reports and Manifests

As requested in your letter of April 4, 1983, and pursuant to 10CSR 25-7.011(2)(C)3.B, I am hereby authorizing the following persons to sign reports and manifests as required by the Missouri Department of Natural Resources:

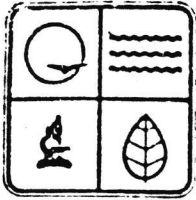
Don R. Conner  
Walter R. Moody  
Jack L. Still  
Larry N. Pemberton

Sincerely,

*J. E. Daniels*

J. E. Daniels, Director  
Plant Engineering

JED/LNP/ef



January 23, 1984

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

Mr. Larry N. Pemberton  
Plant Engineering  
GM Assembly Division - Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

RE: MOD000822668

Dear Mr. Pemberton:

The Department of Natural Resources (DNR) has reviewed your Part B application and response letters to both the DNR and the EPA. We regret the delay in the review of your application, but intend to expedite the final phase of the review process.

Henceforth, the RCRA application review will be conducted at the DNR with EPA approval of comments and draft permits before they are released. Additionally, the DNR will still review the application for compliance with the Missouri Hazardous Waste Management Law and Rules. Response to the letter should be sent to the undersigned and to Mr. Robert Morby of EPA Region VII.

The first eight comments below are based upon incomplete responses to comments previously submitted in Mr. Robert Morby's letter of April 7, 1983. The comment numbers are enclosed in parentheses. It is hoped that the substance of the comments are more clear now.

- (1. (Comment No. 2) In order for your sampling method to be an equivalent method as stated in 264.13(b)(3), the procedure in 260.21 must be followed, which would be a lengthy and difficult process. We recommend that you develop the method in 261 Appendix I for containerized liquid waste.
- (2. (Comment No. 8) There is insufficient justification for a waiver of the Preparedness and Prevention requirements of 264.37. Unless the application can show capability to handle on-site all fire, medical, or other emergencies, arrangements must be made with local facilities, and described in the contingency plan.
3. (Comment No. 11) Pages 11 and 12 in Section G indicate the flow chart for emergency coordinators and notifications. How are these affected during a plant shutdown? If changes would be necessary, they should be indicated.

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director

Mr. Pemberton  
Page 2  
January 23, 1984

4. (Comment No. 13.A) An estimated closure date must be provided as required by 264.112(a)(4) (EPA). Please keep in mind that this estimate may be revised. Also, you should be aware that 10 CSR 7.011(2)(C) (DNR) will require that \$500 be paid prior to issuance of the permit for each year the permit is in effect beyond the first year.
5. (Comment Nos. 13.B and 13.D) Please submit a more detailed closure cost estimate and plan. The cost estimate should include line items such as management of drums and their contents, pallets, and equipment; decontamination; and certification. The plan should specifically describe the steps necessary to decontaminate the storage area and sump.
6. (Comment No. 15) Please provide a description of how the requirements of 264 Subpart E will be met, including reporting periods, term of records, emergency reporting, etc.
7. (Comments No. 17) Design drawings and specifications for the storage facility must be certified by a registered professional engineer as required by 270.14 (EPA). DNR rule 10 CSR 7.011(2)(C)2. requires that the engineer be licensed by the state of Missouri. A registered professional engineer must also provide a general certification that the storage area meets all applicable design requirements of 264 Subpart I (EPA).
8. (Comment Nos. 18 and 19) The holding capacity of the sump pit as required in 264.175(b)(3) (EPA) appears to be inconsistent with the maximum capacity for the storage area. Please provide the design calculations for the sump area which show how the required capacity will be met. The capacity must include an estimated amount of blow in from a 25 year, 24 hour, storm as required by DNR rule 10 CSR 7.050(3)F. Please show this calculation also.
9. Your letter of May 16, 1983 to MDNR indicated the addition of underground tanks containing purge thinner. Please indicate the applicability of 264.190(b) (EPA). You should also be aware of the requirements in 270.72 (EPA) for changes during interim status. Does item F-2b(2) in the permit application need revision? Finally, please revise the closure plan as necessary.

10. In reviewing this application it was found that certain information in the part A form dated 1-19-82 disagrees with the contents of the part B application. Specifically, the following discrepancies were noted:

- a. The part A application lists F003 and F005 wastes but the part B does not specifically address these.
- b. The part A lists the process capacity as 26,253 gallons which is over 450 drums; however, the part B states that the maximum holding capacity is 250 drums.
- c. The part A lists S02 and T04 processes but they are not addressed in the part B.

Please resolve these and amend the application as necessary, including closure.

11. There are several items in the application that need clarification. For our understanding we would request that sketches be provided showing the following items:

- a. The location of the warning signs. Please be advised that DNR rule 10 CSR 25-7.011(3)(D)2.C. will require that these signs be legible from 100 feet.
- b. The location of the "No Smoking" signs in the vicinity of the waste storage area. 264.17 (EPA) requires that these signs be conspicuously placed and visible from all possible approaches.
- c. The layout of the storage area, including aisle space and stacking. Please address how the guidelines of the National Fire Protection Association Code 30 apply, particularly with regard to aisle spacing and quantity pile.
- d. The location of all required emergency equipment such as telephones, alarms, fire extinguishers, water connections, etc. in the vicinity of the storage area.

e. The evacuation route for the waste storage area.

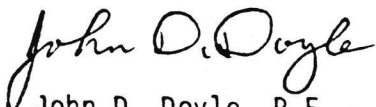
12. Specific items requiring inspection need to be listed on the inspection schedule. Examples of this are contained in pages 167 to 169 and 268 to 296 in "A Guide for Preparing RCRA Permit Applications for Existing Storage Facilities," which we have attached.

Mr. Pemberton  
Page 4  
January 23, 1984

13. The closure cost must be updated for inflation annually within 30 days after each anniversary of the date on which the estimate was prepared as required by 264.142(b) (EPA).
14. The Missouri financial requirements are contained in DNR rule 10 CSR 25-7.011(8). Please describe what steps have been or will be taken to comply with these requirements.
15. The September 1, 1983 Federal Register amended the application certification requirements (270.11(d)). Complying with this requirement will be left to your discretion.
16. Please provide a statement concerning the types of waste burned in your incinerator.
17. In October 1983 EPA published SW-968, "Permit Applicants' Guidance Manual for the General Facility Standards of 40 CFR 264." This might better explain some of the requirements for your permit application.
18. MDNR Form SCT needs to be revised to include waste oil, as stated on page D4 of the application, and underground tanks.
19. All submittals which are revised pages for the application should be dated and numbered appropriately so that they may be incorporated into the application. We would request that 4 copies be submitted to EPA and 5 to DNR.

This letter contains both RCRA and Missouri DNR comments. Please provide a response to these comments by February 14, 1984. If you have any questions regarding these comments contact Dan Tschirgi of this office.

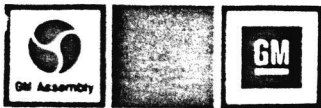
Sincerely,



John D. Doyle, P.E.  
Chief, Technical Services Section  
Waste Management Program

JDD:DMT:mss

cc: Mr. Bob Stewart, EPA  
Kansas City Regional Office



GM Assembly Division

General Motors Corporation

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

February 13, 1984

Mr. David E. Bedan  
Director-Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Dear Mr. Bedan:

In response to your letter of January 10, 1984, we submit the following:

1. The revised financial mechanisms you have requested are presently being researched and prepared through our Corporate Environmental and Financial Staffs.

In a telephone conversation with our corporate people last week, we were told that they are moving forward on this with all haste. It is our understanding that they will be in direct telephone contact with Mr. Paul Meiburger of your staff this week to fill him in with where we are in accomplishing your request.

2. Ground water monitoring is not required at this facility.
3. A revised and updated closure plan and closure cost estimate is included with this correspondence.

J. E. Daniels, Director  
Plant Engineering

By   
L. N. Pemberton  
Plant Engineering

LNP/ef

Enc.

Comment # 5

CLOSURE PLAN  
(For Storage Facilities in Existence  
Prior to November 19, 1980)

I. INTRODUCTION

Under the U. S. EPA regulations, 40 CFR Part 265, Subpart G. Sections 265.110 thru 265.120, each facility which stores, treats or disposes of hazardous wastes must have a Closure Plan on file. This Closure Plan has been prepared to cover the following facility:

1. EPA ID Number      MOD 000 822 668
2. Owner's Name:      General Motors Corporation  
                            GM ASSEMBLY DIVISION  
                            LEEDS PLANT  
                            6817 Stadium Drive  
                            Kansas City, Missouri 64129
3. This Plan has been prepared by L. N. Pemberton, Engineer

February 7, 1984

This Plan has been revised by L. N. Pemberton, Engineer

February 7, 1984

4. The Storage areas described in this Closure Plan consist of:
  - A. That area of the Drum Storage Facility that normally contains drums of designated hazardous wastes.
  - B. One underground storage tank used for storage of Paint Shop purge thinner.

II. MAXIMUM WASTE INVENTORY

The following listing shows the approximate maximum quantity of wastes on hand at any one time:

Sealers, sludges, oils	60 Drums
Waste solvents and thinners	40 Drums
Waste solvents and thinners (underground tank storage)	7,500 gallons

### III. SCHEDULE FOR CLOSING

This facility does not have a definite closure date. Closure will be dependent upon the life of the manufacturing facility. As long as the assembly plant is in operation, we assume the storage facility will be required. The following schedule is open ended. It lists the timetable for closure in terms of elapsed time subsequent to the time that EPA or authorized state agency, has approved this plan:

- Day 1 - Plant termination of hazardous waste activity.
- Day 2 thru 5 - Removal of stored drums.
- Day 6 thru 10 - Removal of tank stored solvents.
- Day 10 thru 25 - Clean up of storage area and clean out of storage tank.
- Day 26 to 30 - Inspection and certification of closure.

### IV. DECONTAMINATION OF FACILITY AND EQUIPMENT

The drum storage facility will be emptied of all drums. The concrete pad and sump will be thoroughly cleaned to remove all residual contamination.

The Waste Storage Tank will be emptied of its contents (Waste thinner). The contents will be delivered to a Resource Recovery facility where they will be burned at no charge. The tank will be cleaned and inspected.

### V. COST ESTIMATES FOR CLOSURE

1. Remove and dispose of all drums to approved waste disposal facilities:	\$23,000
2. Clean up of concrete storage area and sump:	4,000
3. Remove and dispose of waste solvents to R. R. facility:	No charge
4. Clean out and inspect tank:	2,000
5. Certification of proper clean up for closure:	<u>1,000</u>
Total	\$30,000

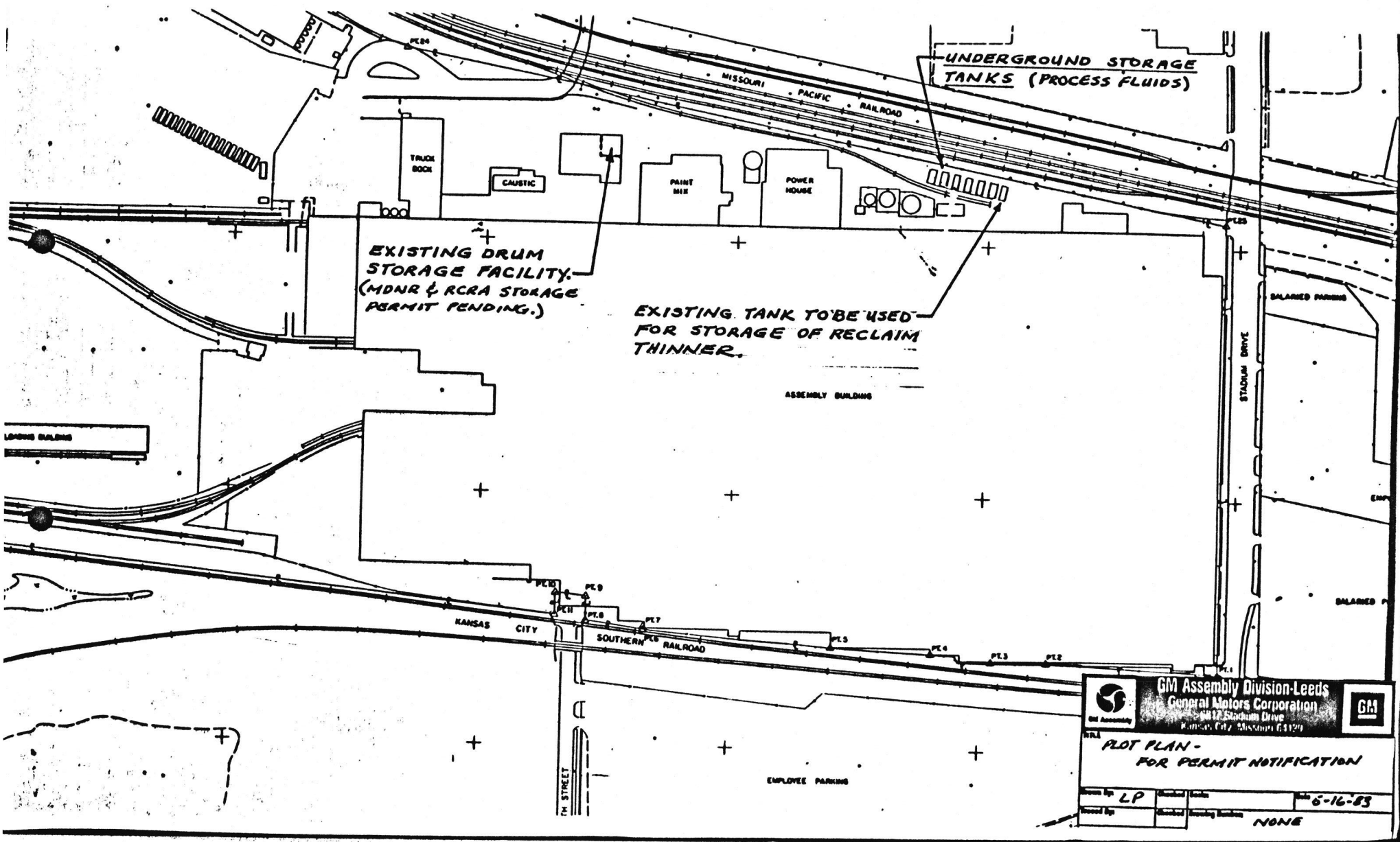
Prepared by:

L. N. Pemberton

L. N. Pemberton, Engineer (Plant Engineering)

M. G. Feuerborn

M. G. Feuerborn, Gen. Supervisor (Financial Dept.)



Comment # 7

RCRA PART "B" PERMIT APPLICATION  
GM ASSEMBLY DIVISION-LEEDS PLANT  
6817 STADIUM DRIVE  
KANSAS CITY, MISSOURI

DATE: 2/22/84

CERTIFICATION

I certify that I have personally examined and am familiar with the design requirements of 40 CFR 264, Sub Part I, "Use and Management of Containers", and specifically 264.175 "Containment". I certify that the Leeds Plant Hazardous Waste Storage Facility meets the design requirements of Sub Section 264.175.

DATE: Feb 20, 1984

SIGNATURE: \_\_\_\_\_

J. E. Daniels

J.E. Daniels, P.E.  
Director-Plant Engineering  
GM Assembly Division  
Leeds Plant

F-2a(1) Types of Problems: (Continued)

Stored materials not covered or secured.

Stored materials not properly stored to prevent spillage.

The inspector looks for these problems in his weekly inspection tours.

F-2a(2) Frequency of Inspection:

The containers in the Hazardous Waste Storage Facility (Drum Storage Canopy) are inspected on a weekly basis by the supervisor of the facility.

F-2b Specific Process Inspection Requirements:

F-2b(1) Container Inspection:

Inspections of the container storage area will be conducted on a weekly basis. Results of the inspections will be recorded on the Inspection Log Sheets. The Inspection Log Sheet contains the date and time of the inspection; the inspector's name; any observations made; the date of repair or correction, if required.

F-2b(2) Tank Inspection:

(This is a buried underground tank.) Once a year the tank will be "stuck" and the liquid level recorded. After an extended period where no additions are made, the tank will be "stuck" again and level recorded will be verified against previous level recorded. This procedure is done once a year for all process storage tanks to determine if any leakage is occurring. Documentation of this procedure is furnished to the plant engineer by the purchasing department. If a tank shows leakage is occurring, it will be emptied and visually inspected to determine the location of, and repair of, the leak.

F-2C Remedial Action:

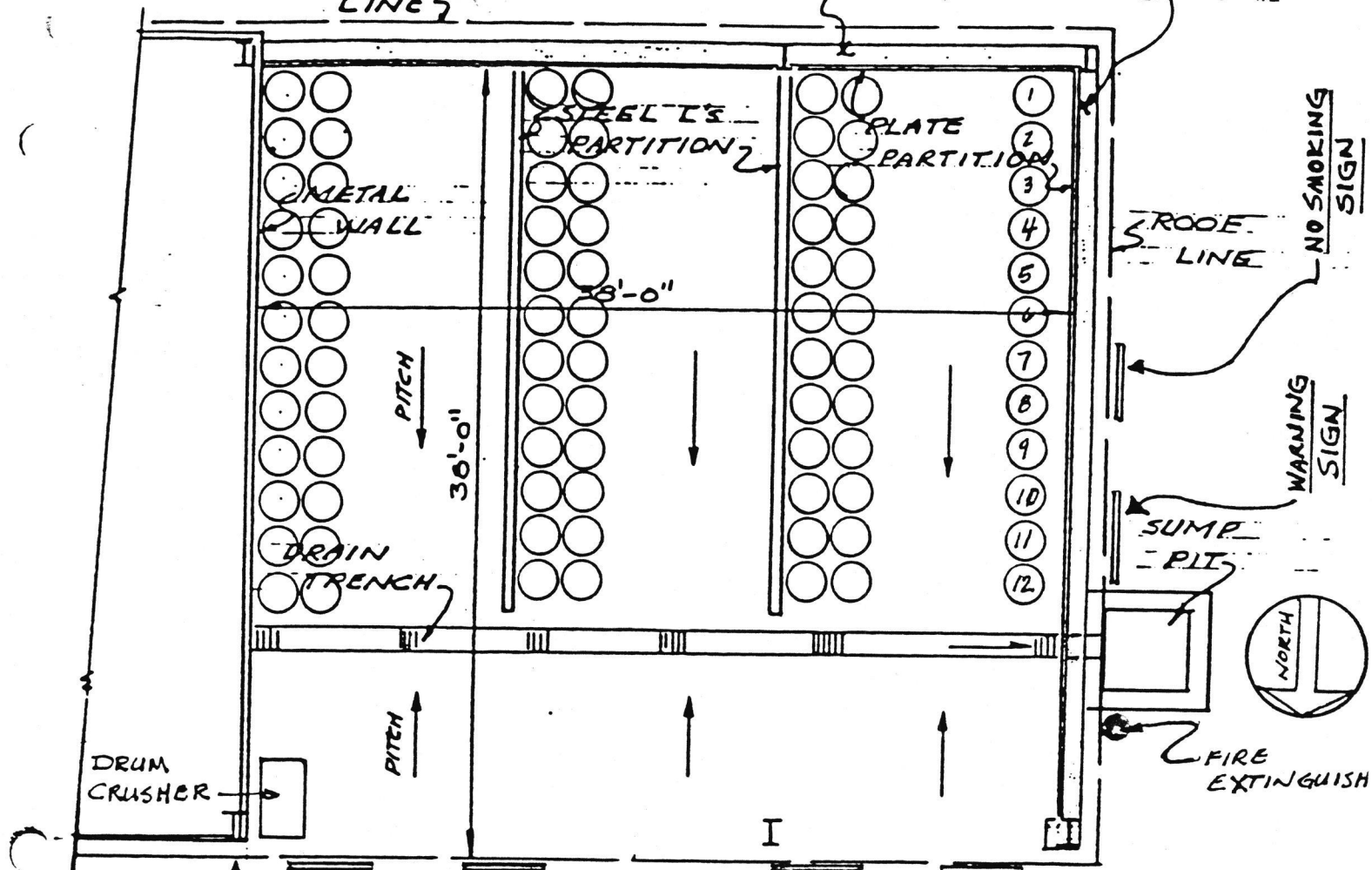
If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately.

ROOF  
LINE

Figure 16

CONT. JOUS CURB

D-3

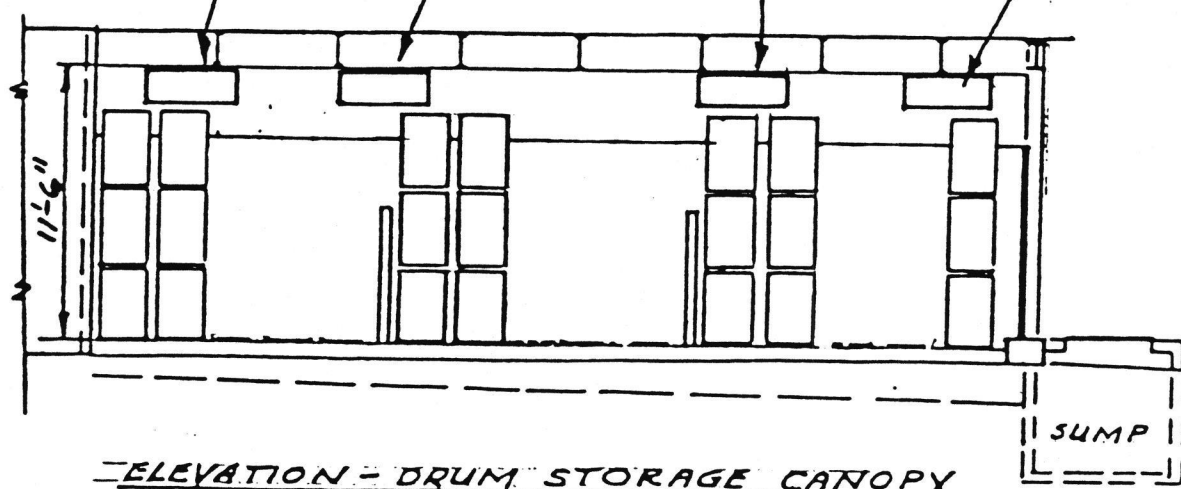


WARNING  
SIGN

NO SMOKING

WARNING  
SIGN

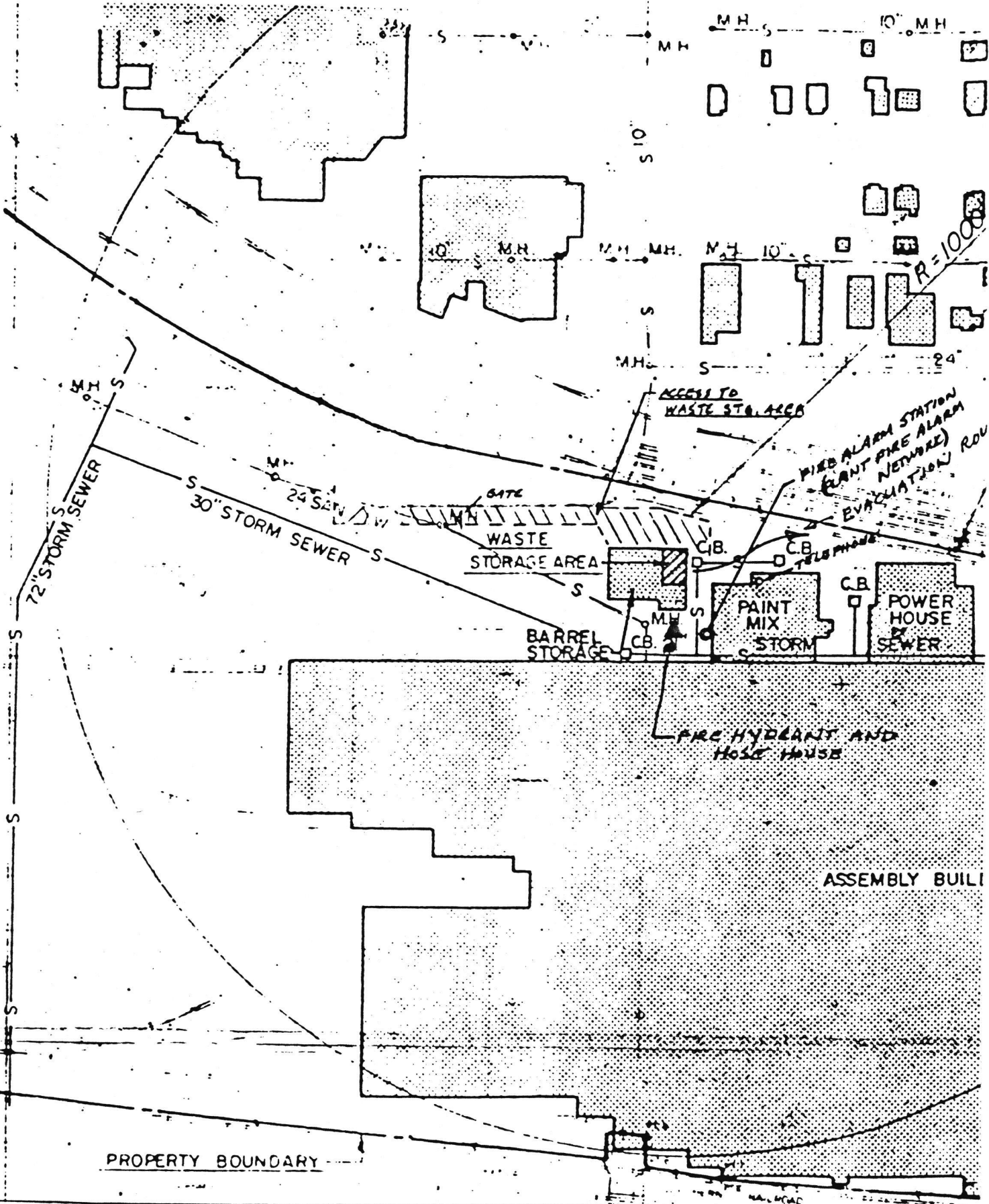
PLAN VIEW - DRUM STORAGE CANOPY  
(HAZARDOUS WASTE STORAGE)



ELEVATION - DRUM STORAGE CANOPY

NOTE: THIS LAYOUT FOR DRUM STORAGE WOULD BE TYPICAL ONLY FOR STORAGE OF LOW FLASH POINT LIQUIDS. IT WILL NOT NECESSARILY BE USED IN STORAGE OF OTHER TYPES OF NON-FLAMMABLE WASTES.

Comment #411



FACILITY MAP OF GM ASSEMBLY DIVISION - LEEDS

STORAGE FACILITY

1. Did the department conduct a preliminary site investigation? ☒ Yes ☐ No
2. Any application for a hazardous waste storage facility must include the following information:

As Required By

- |   |                    |
|---|--------------------|
| A. General Rules Applicable to all Facilities | 10 CSR 25 7.011    |
| B. Storage in Containers and/or               | 10 CSR 25 7.050(3) |
| C. Storage in Tanks                           | 10 CSR 25 7.050(4) |

3. List the type(s) of storage to be utilized at the facility.

Above Ground Tanks		Containers		Underground Tanks	
Number	Capacity	Number	Capacity	Number	Capacity
		250	55 Gallons	1	12,000 G.
		4	500 Gallons		

4. Engineer's Certification

This is to certify that this application has been prepared to comply with the Missouri Hazardous Waste Management Law and all applicable standards, rules, and regulations for hazardous waste storage facilities, specifically 10 CSR 25 7.050. It is my understanding that this facility has been designed to provide adequate protection of the health of humans, and other living organisms.

Registered Professional Engineer Submitting Plans

Name J. E. DANIELS Phone (913) 881-7390

Name of Consulting Firm GM ASSEMBLY DIVISION - LEEDS PLANT

Address 6817 STADIUM DRIVE

City KANSAS CITY State MISSOURI Zip Code 64129

Signature J. E. Daniels Registration No. E 21015 Date 2/14/84

5. Applicant's Certification

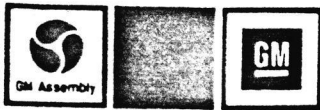
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Operator Signature \_\_\_\_\_ Date \_\_\_\_\_

Land Owner Signature \_\_\_\_\_ Date \_\_\_\_\_

Owner (other) Signature J. E. Daniels Date 2/14/84

J. E. DANIELS, DIR-PLANT ENGINEERING



GM Assembly Division

General Motors Corporation

Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

February 22, 1984

Mr. John D. Doyle  
Waste Management Program  
Missouri Department of Natural Resources  
P.O. Box 1368, 1915 Southridge Drive  
Jefferson City, Missouri 65102

Subject: Reply to comments and additional information  
requested in MR. Doyle's letter of January 23, 1984.

Dear Mr. Doyle:

We are submitting as attachments to this letter our replies to the comments and requests for additional information/clarifications to our part B permit application as submitted in February 1983.

Copies of this letter and all attachments are being sent to Mr. Bob Stewart, Region 7, EPA.

Very Truly Yours,

J.E. Daniels  
Director-Plant Engineering

by:

*L.N. Pemberton*  
L.N. Pemberton  
Plant Engineering

cc: Mr. Bob Stewart, Region 7, EPA ✓  
Mr. G. P. Boszak, GM Assembly Div. Central Office

EPA-ARWM/PMTS

FEB 27 1984

Region VII K.C., MO

Replies to comments in John Doyle letter of January 23, 1984.

COMMENT 1.

The Leeds plant sampling methods used to sample our waste streams are equivalent to the suggested methods in the federal regulations.

The referenced regulation paragraph in 260.21 describes the "Petitions for equivalent testing and or analytical methods." This section of the regulations does not apply to the methods used for sampling wastes, only to methods for testing and analysis of wastes when those test/analysis procedures are different from the test procedures specified in the regulations. (A copy of this section of the regulations is attached for your review.)

The regulation discusses this matter further in 261.20, sub part C., "Characteristics of Hazardous Wastes-General". The "Comment" at the end of this section says that "A person who desires to employ an alternative sampling method is not required to demonstrate the equivalency of his method under the procedures set forth in 260.20 and 260.21. (A copy of this section of the regulation is enclosed for your review.)

The reply on this subject as submitted in our letter to Mr. Robert Morby, dated May 12, 1983, will still apply and is herein restated as follows: The regulations define a representative sample as one which exhibits the average properties of the whole.

The regulations also state the sampling method(s) to be used to obtain a representative sample as follows:

(264.13) General Waste Analysis (b) (3)

The sampling method which will be used to obtain a representative sample of the waste to be analyzed. A representative sample may be obtained using either: (i) one of the sampling methods described in appendix I of Part 261 of this chapter; or----  
(ii) an equivalent method.

Due to the excellent segregation of our waste streams, we feel that the sample methods and samples obtained meet the requirements of the regulations. (Equivalent methods.)

Attachment to Comment 1.

**COMMENT #2**

Rules and Regulations

§ 260.21 Petitions for equivalent testing or analytical methods.

(a) Any person seeking to add a testing or analytical method to Parts 261, 264, or 265 of this Chapter may petition for a regulatory amendment under this section and § 260.20. To be successful, the person must demonstrate to the satisfaction of the Administrator that the proposed method is equal to or superior to the corresponding method prescribed in Parts 261, 264, or 265 of this Chapter, in terms of its sensitivity, accuracy, and precision (i.e., reproducibility).

(b) Each petition must include, in addition to the information required by § 260.20(b):

- (1) A full description of the proposed method, including all procedural steps and equipment used in the method;
- (2) A description of the types of wastes or waste matrices for which the proposed method may be used;
- (3) Comparative results obtained from using the proposed method with those obtained from using the relevant or corresponding methods prescribed in Parts 261, 264, or 265 of this Chapter;
- (4) An assessment of any factors which may interfere with, or limit the use of, the proposed method; and
- (5) A description of the quality control procedures necessary to ensure the sensitivity, accuracy and precision of the proposed method.

(c) After receiving a petition for an equivalent method, the Administrator may request any additional information on the proposed method which he may reasonably require to evaluate the method.

(d) If the Administrator amends the regulations to permit use of a new testing method, the method will be incorporated in "Test Methods for the Evaluation of Solid Waste: Physical/Chemical Methods," SW-846, U.S. Environmental Protection Agency, Office of Solid Waste, Washington, D.C. 20460.

[Comment: This manual will be provided to any person on request, and will be available for inspection or copying at EPA headquarters or any EPA Regional Office.]

**COMMENT #1**

Rules and Regulations

33121

(c) The Administrator will use the criteria for listing specified in this section to establish the exclusion limits referred to in § 261.5(c).

Subpart C—Characteristics of Hazardous Waste

§ 261.20 General

(a) A solid waste, as defined in § 261.2, which is not excluded from regulation as a hazardous waste under § 261.4(b), is a hazardous waste if it exhibits any of the characteristics identified in this Subpart.

[Comment: § 262.11 of this Chapter sets forth the generator's responsibility to determine whether his waste exhibits one or more of the characteristics identified in this Subpart.]

(b) A hazardous waste which is identified by a characteristic in this subpart, but is not listed as a hazardous waste in Subpart D, is assigned the EPA Hazardous Waste Number set forth in the respective characteristic in this Subpart. This number must be used in complying with the notification requirements of Section 3010 of the Act and certain recordkeeping and reporting requirements under Parts 262 through 265 and Part 122 of this Chapter.

(c) For purposes of this Subpart, the Administrator will consider a sample obtained using any of the applicable sampling methods specified in Appendix I to be a representative sample within the meaning of Part 260 of this Chapter.

[Comment: Since the Appendix I sampling methods are not being formally adopted by the Administrator, a person who desires to employ an alternative sampling method is not required to demonstrate the equivalency of his method under the procedures set forth in §§ 260.20 and 260.21.]

COMMENT 2.

The Leeds Plant has reviewed the requirements of 264.37, 265.37, and 265.53. After reviewing these requirements, we are convinced that our original reply to this part of the regulations has been sufficiently described and shown to be equivalent to handle any emergency which might occur at the Leeds storage facility. A description of how these requirements will be met is as follows:

If outside medical assistance should be required, the request for assistance will be handled by the Plant Medical Director. He will be most knowledgeable about the type and quantity of assistance that will be required. He will also know which medical facility to contact to obtain the medical assistance best suited to the emergency.

Plant Security personnel are trained to handle most emergencies that might occur under the Contingency Plan. If the occasion should arise where the Plant Security personnel need assistance from local police, the Chief of Plant Security will call the local police department and arrange for additional assistance.

The local fire departments that service the Leeds Plant are invited into the plant and are taken on supervised tours of the facility where the potential fire and/or explosion hazards exist, (i.e., paint mix rooms and storage, propane, waste storage, foam storage, etc.). They are shown how our fire protection systems operate and where the access to plant gates and other entry areas are located. This existing fire security program would not be improved upon by the submission of our Contingency Plan to the department.

The determination of whether to call in additional state and local emergency response teams will be made by the Plant Engineer on a case-by-case basis as determined by the circumstances.

In summary, it has been determined that most emergency situations that might arise involving RCRA permitted facilities can be handled by plant personnel. A severe fire emergency could be an exception to this. We are satisfied that additional help in this area is adequately planned and provided for in the existing fire programs with the City fire companies.

COMMENT 3.

Page 11. The emergency coordinator activities fulfilled by the maintenance general supervisor automatically shift to the "back-up" coordinator, plant security-duty sergeant, in the event the maintenance general supervisor is not present for any reason. At all times the plant security duty sergeant will be on duty to fill the coordinator tasks if the maintenance general supervisor is not in the plant.

Page 12. The emergency coordinator for fire is the plant security duty sergeant. This is in accordance with existing plant operating procedures. The main plant security station receives any fire alarms on their monitoring panel. In the event of fire at the hazardous waste storage area, there is a fire alarm station at the paint mix building located in close proximity to the waste area. During periods of plant shut down, the plant security officers tour all plant and yard areas. No changes in the flow charts are required.

COMMENT 4.

An estimated date of closure is not possible since the storage facility exists for the purpose of handling the Leeds Plant wastes. As long as the plant continues to operate in the production of automobiles the storage facility will continue to be used.

10 CSR 27-7.011(2)(D)2. indicates that a permit can be issued for a maximum of 5 years. We would be willing to accept a 5 year permit for the Leeds facility.

COMMENT 5.

A revised closure plan and cost estimate is submitted as requested.

COMMENT 6.

Subpart E.-Manifest system record keeping and reporting. (Sections 264.71, 264.72, and 264.76 do not apply to facilities that do not receive hazardous wastes from off site.) The Leeds plant keeps the following records as required by regulation:

264.73-operating record; contains a description of the wastes stored, where stored, and how many drums or containers. This record is up-dated once each month.

- (1) Records of waste analysis performed are kept in the plant engineering offices and are maintained by the plant environmental engineer.
- (2) Summary reports and details of incidents that require implementing the contingency plan will be maintained as required.
- (3) Records of inspections are maintained by the supervisor of the hazardous waste storage area. These are kept for the required length of time.

264.74-All in-plant records on storage and shipment of hazardous wastes are available for inspection as required by regulations.

264.75-An annual report will be prepared and submitted as required by regulations.

264.77-Additional reports will be submitted to the control authority on emergency events such as fire or explosion.

COMMENT 7.

A copy of the certified design drawing for the storage facility was included in our letter to Mr. Robert Morby dated May 12, 1983. The design drawing contains specifications for the foundations, concrete, and steel for the storage facility structure and containment pad and sump. We have one additional copy of the certified design drawing which we are enclosing to the DNR.

We are including as an attachment to this correspondence a certification statement by a registered professional engineer indicating that the storage facility meets the design criteria as described in 264 sub part 1.

COMMENT 8.

The containment system (sump pit) will contain a volume of approximately 500 gallons. The storage volume of liquids in the storage facility are limited (by in-house practice) to a maximum of approximately 80 drums. These liquids may be made up of waste solvent, paint, or oil, depending on what the requirements are at any given time. The total liquid waste in the storage facility will normally not exceed approximately 4000 gallons. 264.175 (a)(3) indicates the containment should be 10% of the volume of the containers. The 500 gallon sump capacity meets this requirement. 25-7.050 (3)(F)C. Describes a containment with "sufficient freeboard to allow containment of precipitation resulting from a 24 hour, 25 year storm." Since this storage facility is covered by roof, precipitation is directed away from the storage area and the "freeboard" requirement is not applicable.

COMMENT 9.

The tank used for storage of waste purge thinner is a covered, underground tank. Item F-2b(2) in the permit application covers tank inspection. This item will be revised in an attachment to this correspondence.

COMMENT 10.

a. The original generic listings of solvents in the federal register listed under Foo3 (among several other solvents) xylene and acetone. Both of these solvents are contained in solvent mixtures used in our painting operations. The Foo5 listing included toluene which is also a component of some of the solvent mixtures used in this facility. Our procedure on the waste solvents generated has been to list all waste solvents under the general category of D001, ignitable. This is the way we identify all waste solvents and all solvents are handled on the basis of being an ignitable waste. It would be impossible to identify all of our waste solvents by generic name, since all are mixtures.

b. In the original part "A" application we did not give consideration to aisle space requirements, but instead used the total volume of the storage facility (hence the capacity of 26,253 gallons). With aisle space and stack height considerations, the volume would be reduced to approximately 250 drums.

c. The S02 process listed in the part "A" application was assumed at the time of submission, to be a storage tank, while in reality it was, and is, a process tank (caustic strip tank). The waste sludges generated from these tanks are listed with the DNR in our hazardous waste listings as "caustic sludge" (D002). These wastes are stored on site and shipped for disposal in drums. The T04 process listed in the part "A" application was a process included in a production unit for the reduction, precipitation, and removal of chromium sludge. This process has been eliminated at the Leeds plant and so no longer applies in the part B application.

COMMENT 11.

- a. Location of warning signs are shown on a revised figure 16 drawing. These signs are legible from 100 feet.
- b. Location of NO SMOKING signs is shown on revised figure 16 drawing. Access to the storage area for personnel and equipment is from the north side only.
- c. Layout of the storage area is shown on the figure 16 drawing. The guideline  
s of NFPA code 30 apply to those containers in which low flash point liquids are stored. In this facility this would include waste solvents and/or waste paints which normally would not exceed 40 drums maximum.
- d. Locations of emergency equipment are shown on enclosed sketch from the "facility map".
- e. Evacuation route is also shown on the sketch from the "facility map".

COMMENT 12.

Inspection logs will be revised to conform to the general idea of the EPA suggested guide.

COMMENT 13.

Closure plan and cost estimate has been revised and is included as an attachment to this correspondence.

COMMENT 14.

Revised financial assurance mechanisms have been requested by the MDNR under a separate request. (David Bedan letter of January 10, 1984.) GM corporate environmental and financial staffs are now working to put together the required documents.

COMMENT 15.

N.A.

COMMENT 16.

The Leeds facility presently has installed three incinerators. Two general waste incinerators are in everyday use. They were designed and are used for disposal of plant generated general plant waste such as paper, cardboard, wood, etc. We also have installed a rotary kiln paint sludge incinerator. This unit is not in production operation. It has been test fired on two occasions, (for stack tests and feed tests). These tests were of one day or less duration.

The paint sludge incinerator we plan to use at some future date. In order to be able to make efficient use of this incinerator, we need to make some revisions to our existing paint sludge collection and removal systems to allow us to "feed" paint sludge into the incinerator in small quantities. We presently have not established a schedule to make these revisions.

No wastes have been incinerated that are classified or listed as hazardous wastes under RCRA or Missouri Hazardous Waste

Mr. John Doyle  
2/22/84

page 6.

COMMENT 17.

Since our original part B application was submitted in February 1983, it seems that the manual you suggest we refer to may have been published a little late to be of any help to us.


COMMENT 18.

MDNR form SCT has been revised to include the underground tank used for purge thinner waste storage and to include the waste oil containers.

DNR-HWF-1

# MONTHLY FACILITY REPORT

Page 1 of 1

Facility Name \_\_\_\_\_ EPA I.D. Number  Mo. I.D. No. \_\_\_\_\_ Page 1 of \_\_\_\_\_  
Reporting Month \_\_\_\_\_ Street \_\_\_\_\_ City \_\_\_\_\_ County \_\_\_\_\_ State \_\_\_\_\_ Phone \_\_\_\_\_  
\_\_\_\_\_ Zip Code \_\_\_\_\_

[illegible]

\*Mark: 1. tons; 2. Gallons; 3. cubic yards; 4. drums - 55 gallon; or 5. pounds

Quantity and disposition of any hazardous residues

I have attached monitoring data in accordance with 10 CSR 25-7.011(10) ☐ Yes ☐ No

I have personally examined and am familiar with the information submitted on this form, and I hereby certify under penalty of law that this information is true, accurate, and complete to the best of my knowledge and ability. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date \_\_\_\_\_ Authorized Signature \_\_\_\_\_ Title \_\_\_\_\_

GENERAL INSTRUCTIONS: This report shall be filed by the fifteenth day of the month following the report month. This report shall meet the routine reporting requirements of subsection 10 CSR 25-10.7.011(6)(C).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI - 64106

APR 18 1984  
CERTIFIED MAIL

Return Receipt Requested

Mr. Larry N. Pemberton  
Plant Engineering  
GM Assembly Division - Leeds Plant  
6817 Stadium Drive  
Kansas City, Missouri 64129

RE: EPA ID NO. MOD000822668

Dear Mr. Pemberton:

NOTICE OF DEFICIENCY/LETTER OF WARNING

The Missouri Department of Natural Resources (MDNR) and the Environmental Protection Agency (EPA) have reviewed the information submitted by you on February 22, 1984, in response to our letter of January 23, 1984. We still have a number of comments, as discussed below, which must be adequately addressed before we can consider the application complete. If the application remains incomplete following your response to these comments, EPA may initiate an enforcement action pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA) and/or the process for denial of your permit application and termination of interim status pursuant to 40 CFR §124.3(d) and §270.10(e)(5). A response date of May 4, 1984, has been established. Please contact Dan Tschirgi at (314) 751-3241 and Luetta A. Flournoy at (816) 374-6531 if you wish to request a meeting regarding this matter. We do strongly encourage such a meeting prior to your response due date.

The following comments are offered.

PREVIOUS COMMENTS

Comment No. 1

The regulations in 40 CFR 264.13 do specifically require use of the sampling methods described in 40 CFR Part 261 Appendix I or an equivalent method as does 10 CSR 25-7.011(3)(C)4.C. The comment following the EPA regulatory requirement then refers to 40 CFR 260.21 for a discussion regarding petitions for equivalent methods. Therefore, a petition would have to be submitted and approved before an equivalent method can be allowed in your permit application. You have also not demonstrated that the proposed sampling methods are equivalent. We strongly encourage you to use the methods specified in 40 CFR Part 261 Appendix I rather than pursuing a petition.

Comment No. 2

There is still insufficient justification for a waiver of the preparedness and prevention requirements in 40 CFR 264.37. Since there is a potential need for services of local fire departments and hospitals, arrangements must be made and described in the contingency plan. This must include documenting which fire departments were invited to and which toured the plant. Also, unless the Plant Medical Director will be on-site or on-call at all times, you must supply local hospitals with properties of wastes handled and types of injuries/illnesses that could result from exposure to the wastes. In addition, copies of the contingency plan must be provided to all police departments, fire departments, hospitals, emergency response teams that may be called upon to provide emergency services by 40 CFR 264.53. Please document in the application who is sent a copy of the contingency plan.

Comment No. 3

a. Page G10 indicates that there may be times when there are no designated emergency coordinators in the plant. Although your February 22, 1984, response states that plant security officers will tour all plant and yard areas during a plant shut-down, you do not state that a designated emergency coordinator will be on-site at all times. Unless a definite commitment to this effect can be made, home telephone numbers must be listed.

b. Since there may be times when more than one designated emergency coordinator is on-site at the same time, you must specify one as the primary emergency coordinator and the others in the order in which they will assume responsibility as alternates per 40 CFR 264.51(d).

c. Since copies of the contingency plan must be distributed externally, the contingency plan must also list the entire telephone number for your facility.

Comment No. 4

The five year State permit life in 10 CSR 25-7.011(2)(D)2. is no longer applicable, as legislation effective June 27, 1983 (260.395 RSMo) specifies lifetime permits. However, we anticipate that legislation in 1984 will again change the permit life up to a maximum of 10 years. Please state your desired permit life up to a 10 year maximum.

A formal request for a waiver from the regulatory requirement to list an expected closure date in the closure plan must be submitted to Mr. David Wagoner, EPA, and Dr. David Bedan, MDNR. Please provide all justification for not providing this date, including any undue stress or hardship that GM Leeds would experience. Both agencies will then review your request and provide a written response.

A facility life of greater than 20 years must be based on engineering calculations.

Comment No. 5

- a. The closure plan indicates that the waste thinner will be removed from the underground tank and provided to a Resource Recovery Facility which will burn the waste at no charge. We are not aware of any such facility which will burn hazardous wastes free of charge. Unless you can verify that such a facility exists which has authorization to accept these wastes, costs for managing these wastes in an acceptable manner must be included in your cost estimate.
- b. The closure plan does not indicate that the underground tank will be removed after closure. Appendix B from NFPA's Code 30 recommends certain procedures when underground tanks are abandoned or removed. If the tank shall be left in-place, we recommend that you follow the procedures in Section B-3, which is attached for your information and use. Please provide a discussion regarding this matter.
- c. Since the Missouri regulations list the waste oil as a hazardous waste, the closure plan and cost estimate must address the waste oil. Information should also be provided regarding whether or not the waste oil meets any of the characteristics such as ignitability or EP toxicity.
- d. The closure plan and cost estimate must specifically indicate that an independent professional engineer and the owner/operator will certify closure.
- e. A cost for contingencies and administrative costs must be included in the closure plan. Generally, 15 percent of the closure cost estimate is reasonable for each of these items.
- f. Please note that increases in the closure cost estimate will require revisions to the closure financial mechanism.
- g. The closure plan must specifically address the decontamination of structures such as the concrete pad, sump and tank. For example, information on the following items must be provided.
- How these structures will be cleaned.
  - An estimate of the waste volume generated from the decontamination.
  - How the decontamination wastes will be handled.
  - Cost of the decontamination (labor, cleaning agents, subsequent management of the wastes, etc.).
  - How it will be determined that decontamination is complete.
- h. The Part B application must include a brief discussion of how the cost estimate will be updated annually for inflation, including the date by which such update will be made, and subsequent revisions to the closure financial mechanism. Refer to 40 CFR 264.142(b) and the guidance manuals for additional guidance.

i. The timetable which you have provided begins at the time that MDNR and/or EPA approves the closure plan. Please note that issuance of a permit will essentially constitute approval of the closure plan in the Part B application. Therefore, you should not base the timetable upon our approval. The timetable should indicate, however, that EPA and MDNR will be notified at least 180 days before closure is expected to begin. Closure is expected to begin within 30 days after the last volume of wastes is received. In addition, please refer to 40 CFR 264.113 for information on the time allowed for closure.

Comment No. 6

a. Per 40 CFR 264.73, certain information must be recorded as it becomes available and maintained in the operating record until closure of the facility. It is not acceptable to indicate that the operating record will be updated once each month. In addition, you must indicate that the information regarding the type and quantity of hazardous waste and the management method and date will be maintained as required by 40 CFR Part 264 Appendix I.

b. The operating record must also contain all closure cost estimates per 40 CFR 264.142.

c. In reference to the reporting requirement of 40 CFR 264.75, the reporting frequency is biennially, not annually.

Comment No. 7

Although your May 12, 1983, letter to EPA indicated that a copy of a certified design drawing for the storage facility was enclosed, no such drawing was actually received as an enclosure by EPA. Please provide four copies of the drawing to both EPA and MDNR.

Comment No. 8

As shown in Figure 16, any rainfall which blows in under the roof will drain to the trench and sump area. Therefore, a registered professional engineer must provide design calculations regarding the maximum expected amount of precipitation which could blow in from a 25-year, 24-hour storm event. This amount must be included in the design calculations for the sump.

The Department is anticipating writing draft RCRA and MDNR permits which set a maximum volume of waste to be stored, including waste oil, with a sump capacity equal to 10 percent of that volume or the volume of the largest container, whichever is larger, plus precipitation. Discrepancies still exist in the application as to what that maximum volume is to be, such as the reply to comment 10.b and the closure cost estimate, which state 250 drums and 100 drums, respectively.

The Part B application must address management of any precipitation and/or spilled material which has accumulated in the secondary containment system. Per 40 CFR 264.175, the sump area must be emptied in a timely manner to prevent overflow of the containment system. There are two options, as described below, for determining whether or not the accumulated precipitation should be managed as hazardous wastes.

a. Test any accumulated precipitation for all hazardous constituents present in the stored wastes. If no hazardous constituents are detected, and the accumulated precipitation does not meet any of the characteristics, the precipitation does not have to be managed as hazardous wastes.

b. If all wastes to be stored on the concrete pad have a visible color, obvious odor, or form specific layers in water, a visual inspection of the containment area and sump may be adequate to determine whether or not the accumulated precipitation should be managed as hazardous wastes. If this option is pursued, the following items will have to be addressed.

° A visual inspection must be done following an approved checklist, which will address color of the waste in storage, layers of solvent at the bottom or surface of the liquid, any odor evident in the general area, an inspection of the containers and containment area for leaks, and a sample taken from the bottom of the sump for further visual inspection. The inspection form must be placed in the operating record.

° The application must describe materials of construction, including color, of the containment area and sump to assure visibility of colors and layers.

° The waste analysis plan must include a verification analysis by visual inspection of a random number of drums. The color of each lot of drums must be recorded and consulted before the above inspection, so that colors of the materials in storage will be known.

° The application must include data on previously accepted waste with regard to colors, layering and odors. We are specifically interested in how much of the current waste has a visible color, an obvious odor, or form specific layers in water.

° If the waste passes these inspections, it may then be handled as storm water, although the application should address the point of discharge. If the water is contaminated, it must be handled as hazardous waste.

#### Comment No. 9

a. Please submit a waste analysis for the waste stored in the underground tank and be sure the waste is listed on the EPA and MDNR forms where appropriate.

b. The regulatory status of the underground tank depends upon the type of hazardous waste stored, subsequent management of the waste and the length of time wastes are stored in the tank as discussed below.

(1) If the waste stored in the underground tank is a characteristic waste only and not a waste listed in 40 CFR 261.31 or 261.32, the tank would not be subject to regulation presently if the waste is being beneficially reclaimed as you indicated in your May 16, 1983, letter to MDNR. However, you would be required by MDNR under 10 CSR-7.050(5)(B)4 to either empty this tank once a year or obtain a permit.

(2) If the waste is listed in 40 CFR 261.31 or 261.32, the tank is subject to regulation per 40 CFR 261.6(b). Unless you comply with 40 CFR 262.34 and remove the wastes at least every 90 days, this tank will have to be addressed in the permit application and receive a permit for operation. Please note, however, that a RCRA permit can be issued for this underground tank only if it can be entered for internal inspection. Based upon Section F-2b(2) in the application, it appears that the tank can be emptied and entered for inspection. Please note that a leak detection system is required by MDNR under 10 CSR 25-7.050(4)(A)3, if the tank cannot be entered for inspection.

Substantial revisions to the Part B application will be necessary if the tank requires a permit. Applicable regulations may be found at 10 CSR 25-7.050(4)(A)1, 40 CFR 264 Subpart J and 40 CFR 270.16. In addition, please refer to pages 33-36 and 142-150 in the "Guide for Preparing RCRA Permit Applications for Existing Storage Facilities" for guidance regarding the type of information which must be provided for our review. A list of some of the required information follows:

- (a) The age of the tanks;
- (b) The design standard code by which the tank was designed;
- (c) A description of design specifications;
- (d) Tank dimensions, capacity and shell thickness;
- (e) A diagram of piping instrumentation and process flow;
- (f) Description of feed systems, safety cutoff, bypass systems and pressure controls;
- (g) The minimum required thickness of the tank walls based upon the design standard or other engineering data.
- (h) The specific gravity of the hazardous wastes in the tank;
- (i) Maximum height of the liquid level in the tank;
- (j) Expected service life of the tank based upon the measured uniform wall thickness, the calculated minimum wall thickness, and the rate of corrosion;
- (k) Tank management practices as discussed on pages 35-36 in the above referenced guidance manual.
- (l) Detailed engineering specifications and drawings for the tank foundation, structural supports and tanks including any ancillary equipment such as seams, gaskets, pumps, piping, valves, fittings, level controls, pressure controls, etc.
- (m) The frequency at which this tank is emptied.

Depending upon the age of the tank and the design information available for the tank, an internal inspection and a shell thickness determination may be required prior to issuing the draft permit for public notice.

All design information and engineering drawings for the tank must be certified by a registered professional engineer. In addition, a general certification must be provided stating that the tank meets all applicable design requirements in 40 CFR 264 Subpart J.

The following information is requested regarding any underground piping to and from the tank.

- (a) The type of pipe used;
- (b) The age of the pipe;
- (c) Date of installation;
- (d) Construction/installation procedures used;
- (e) Depth of the pipe, including its location with respect to the frostline;
- (f) An engineering drawing showing the pipe's location, depth, slope, valves, etc.
- (g) A discussion regarding methods used or which could be used to ensure that the pipe is not leaking.

c. Some items in the application still need revision, such as items D-2 and F-5e.

d. Please state when you started using the underground tank for storage of hazardous wastes.

#### Comment No. 10

a. The waste analysis plan must identify all of the solvents contained in solvent mixtures. Please state whether each solvent mixture is mixed prior to use or after use. 40 CFR 262.11 and 261.3(a)(2)(iv) explain the criteria that must be used to identify hazardous wastes.

b. Additional information should be provided regarding the production process and the points in that process where hazardous wastes are generated. In addition, please discuss the elimination of the T04 process, including when this occurred, whether any wastes were generated, how such wastes were managed, and whether or not the process equipment was decontaminated.

#### Comment No. 11

a. & b. Please clarify whether approach is possible from the south side of the storage area. If so, a warning sign and no smoking sign must also be placed on the south side since these signs must be visible from any approach.

c. As requested previously, please address the specific guidelines in the NFPA Code 30 which apply to your facility and whether or not GM Leeds will comply. These guidelines vary depending upon the type of building and the waste classification. Some types of wastes may not be stacked at all or only two drums high. In addition, Figure 16 does not specify the amount of aisle space.

d. Based upon Figure 16, it does not appear that you plan to use pallets. We do strongly recommend the use of pallets.

e. Although the locations of some emergency equipment were shown on the revised facility map, all of the equipment was not shown. A section of your application talks about using sand or absorbent to contain leaks or spills but these items are not listed in your contingency plan or shown on any sketch. The emergency equipment listed in Section G, page 28 were also not shown. In addition, there may be a need for self-contained breathing apparatus if internal inspection of the underground tank is necessary. As required by 40 CFR 264.52(e), the contingency plan must list all emergency equipment, show the location, describe each item, and briefly outline its capabilities. Your contingency plan does not adequately meet these requirements and must be revised.

Comment No. 12

The revised inspection logs must be submitted for our review and comment.

Comment No. 14

The State required mechanism for financial assurance may be used to meet the Federal requirements if 40 CFR 264.149 is followed. You must request via written letter to the EPA Regional Administrator use of the State-authorized mechanism; otherwise, the applicant may be required to maintain two separate financial assurance mechanisms to satisfy both State and Federal requirements. In addition, the financial assurance documents must be submitted as part of the revised permit application.

Comment No. 16

Your February 22, 1984, response states that no hazardous wastes have been incinerated and that there are plans to use the paint sludge incinerator at some future date. Information should be provided which indicates whether or not the paint sludge fails any of the characteristics such as ignitability or EP toxicity. In addition, please indicate whether or not there are plans to incinerate hazardous wastes in the future.

Comment No. 17

The referenced guidance should still be of assistance due to the number of revisions which are necessary to your Part B application.

Comment No. 19

Revised application pages must be provided whenever a change is needed due to our comments and/or your response. Please date and number any revised pages and submit five copies to MDNR and four copies to EPA. We do still recommend that a cover letter be provided which addresses where and how our comments have been addressed.

OTHER COMMENTS


a. A sample of the type of training records which are and will be maintained must be included in the Part B application.

b. Page G-4 implies that there are areas at the plant where wastes are stored for less than 90 days. Please provide a discussion regarding these accumulation areas, including a statement regarding the requirements in 40 CFR 262.34.

c. In reviewing previous correspondence, one issue not adequately addressed concerns flooding of the facility. Our concern is whether or not your facility will have sufficient advance notice to move the wastes if necessary. Please provide information on the estimated time available to move the wastes, and the personnel that will be utilized.

As stated previously, a complete response to this comment letter must be provided by May 4, 1984. If you have any questions or comments regarding this matter or wish to request a meeting, please contact Dan Tschirgi at (314) 751-3241 and Luetta Flournoy at (816) 374-6531.

Sincerely yours,

  
David A. Wagener  
Director, Air and Waste Management Division

Enclosures

cc: Joe Jansen, MDNR

NFPA

30

**FLAMMABLE AND  
COMBUSTIBLE  
LIQUIDS CODE  
1981**



NATIONAL FIRE PROTECTION ASSOCIATION

1735 BELL STREET, BOSTON, MA 02114

## Appendix B Abandonment or Removal of Underground Tanks

*This Appendix is not part of the requirements of this NFPA document, but is included for information purposes only.*

### B-1 Introduction.

**B-1-1** Care is required not only in the handling and use of flammable or combustible liquids but also in abandoning tanks which have held flammable or combustible liquids. This is particularly true of underground service station tanks which are most frequently used for the storage of motor fuel and occasionally for the storage of other flammable or combustible liquids, such as crankcase drainings (which may contain some gasoline). Through carelessness, explosions have occurred because flammable or combustible liquid tanks had not been properly conditioned before being abandoned.

**B-1-2** In order to prevent accidents caused by improper conditioning, it is recommended that the procedures outlined below be followed when underground tanks are removed, abandoned or temporarily taken out of service.

**B-1-3** Underground tanks taken out of service may be safeguarded or disposed of by any one of the three following means:

(a) Placed in a "temporarily out of service" condition. Tanks should be rendered "temporarily out of service" only when it is planned that they will be returned to active service within a reasonable period or pending removal or abandonment within 90 days.

(b) Abandoned in place, with proper safeguarding.

(c) Removed.

**B-1-4** In cases where tanks are either rendered "temporarily out of service" or permanently abandoned, records should be kept of tank size, location, date of abandonment, and method used for placing the abandoned tank in a safe condition.

**B-1-5** Procedures for carrying out each of the above methods of disposing of underground tanks are described in the following sections. No cutting torch or other flame or spark producing equipment shall be used until the tank has been completely purged or otherwise rendered safe. In each case, the numbered steps given shall be carried out successively.

### B-2 Rendering Tanks "Temporarily Out of Service."

**B-2-1** Cap or plug all lines such as fill line, gage opening, pump suction, and vapor return. Secure against tampering.

**B-2-2** Disconnect piping at all tank openings.

### B-3 Abandoning Underground Tanks in Place.

**B-3-1** Remove all flammable or combustible liquid from the tank and from all connecting lines.

**B-3-2** Disconnect the suction, inlet, gage, and vent lines.

**B-3-3** Fill the tank completely with an inert solid material. Cap remaining underground piping.

### B-4 Removal of Underground Tanks.

**B-4-1** Remove all flammable or combustible liquids from tank and from connecting lines.

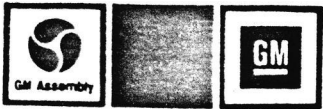
**B-4-2** Disconnect piping at all tank openings. Remove sections of connecting lines which are not to be used further and cap or plug all tank openings. After removal, the tank may be gas freed on the premises if it can be done safely at that location, or may be transported to an area not accessible to the public and the gas freeing completed at that location.

### B-5 Disposal of Tanks.

**B-5-1** If a tank is to be disposed of as junk, it should be retested for flammable vapors, and, if necessary, rendered gas free. After junking and before releasing to junk dealer, a sufficient number of holes or openings should be made in it to render it unfit for further use. NFPA 327, *Standard Procedures for Cleaning or Safeguarding Small Tanks and Containers*, provides information on safe procedures for such operations.

### B-6 Reuse of Underground Tanks.

**B-6-1** Used tanks which are to be reused for flammable or combustible liquid service should meet all the requirements of this code for the installation of underground tanks.



*Copy to: ~~Sanitation~~  
Route to: Live the*

**GM Assembly Division**

**General Motors Corporation**

**Leeds Plant**  
6817 Stadium Drive  
Kansas City, Missouri 64129

May 3, 1984

Mr. Lynn Harrington  
Waste Management Division  
U. S. Environmental Protection Agency - Region VII  
324 East 11th Street  
Kansas City, Missouri 65106

1-100WMPMTS  
MAY 4 1984  
REGION VII K.C., MO

Dear Mr. Harrington:

This correspondence will confirm the discussions held at the meeting in your office May 2, 1984.

The meeting was held at the request of the Leeds Plant in response to the letter from David A. Wagoner, dated April 18, 1984.

In our discussion we indicated that the Leeds Plant is planning to request withdrawal of our part "B" application for a generator/storage facility permit. After this is accomplished we would then revert to "generator" status.

We understand that we will be required to submit a formal letter requesting withdrawal of our part "B" application.

We will begin immediately to obtain the required corporate approvals and will respond with a formal withdrawal letter as soon as it can be drafted and approved.

We appreciate your cooperation in this endeavor.

Sincerely,

*J. E. Daniels*

J. E. Daniels, Director  
Plant Engineering

JED/ef

1-100WMPMTS  
MAY 4 1984  
REGION VII K.C., MO

U.S. ENVIRONMENTAL PROTECTION AGENCY

RCRA INSPECTION  
CONFIDENTIALITY NOTICE

<p>Name and Address of Inspector(s)</p> <p>JOHN W. BOSKY U.S. EPA REGION VII ENVIRONMENTAL SERVICES DIVISION 25 FUNSTEN ROAD KANSAS CITY, KANSAS 66115</p>	<p>Name and Address of Facility</p> <p>COM LEEDS K.C. MO.</p> <p>Owner, Operator, or Agent in Charge</p> <p>Title</p> <p>Address</p>	
<p>Name of Individual to Whom Notice Given</p> <p>JERRY DANIELS</p>	<p>Title</p> <p>DIR. OF PLANT ENGINEERING</p>	<p>Date</p> <p>6/19/84</p>

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial or financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential and meets the four criteria listed above.

*John Bosky*  
6/19/84

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

The statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner  
Director, Air and Waste Management Division  
United States Environmental Protection Agency  
324 E. 11th Street  
Kansas City, Missouri 64106

and mailed by registered, return-receipt requested mail within seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

---

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name \_\_\_\_\_

Title \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name DAVID EDEN

Title DIRECTOR INATL REGULATIONS

Address ENVIRONMENTAL ACTIVITIES STAFF  
GM TECH. CENTER  
WARREN MICH.

*John P. [unclear]*  
6/19/84

U.S. ENVIRONMENTAL PROTECTION AGENCY  
324 EAST 11TH STREET  
KANSAS CITY, MISSOURI 64106

REQUEST FOR CONFIDENTIAL  
TREATMENT

Name of Individual <i>ERRY DANIELS</i>	Title <i>DIR-ENGR.</i>	Date <i>6/19/84</i>
Firm Name <i>COM LEADS</i>	Firm Address <i>KC, MO</i>	

Information for which Confidential Treatment is requested:

Acknowledgement by Claimant

The undersigned requests that confidential-treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40FR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent)		Title
Name of Inspector <i>JOHN W. BOSKY ENVIRONMENTAL ENGINEER</i>	Title <i>Inspector's Signature</i>	<i>John W. Bosky</i> <i>6/19/84</i>

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: GM LEEDS ASSEMBLY PLANT  
Address: 6817 STADIUM DRIVE  
KANSAS CITY, MISSOURI 64129  
EPA ID Nbr: MPD000522/668 Date: 6/19/84

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40CFR 265.15 (d)(1)</u>	<u>1. ALL SAFETY, EMERGENCY RESPONSE, SECURITY EQUIPMENT NOT ADDRESSED IN INSPECTION SCHEDULE</u>
<u>40CFR 265.15 (D)</u>	<u>2. INSPECTION OF ALL EMERGENCY RESPONSE EQUIPMENT NOT DOCUMENTED IN A LOG.</u>
<u>40CFR 265.16 (D.1)</u>	<u>3. LIST OF PERSONS FILLING HAZARDOUS WASTE MANAGEMENT POSITIONS NEEDS UPDATING</u>
<u>40CFR 265.16</u>	<u>4. EMERGENCY COORDINATORS NOT PART OF PERSONNEL TRAINING PROGRAM.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

**Distribution:**

Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: GM LITTS - CONTINUED  
Address: \_\_\_\_\_

EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
<u>10 CSR 25-2050(4)(6)</u>	<u>5. NO INSPECTIONS/DOCUMENTATION FOR</u> <u>SOLVENT STORAGE TANK</u>
<u>10 CSR 25-2050(4)(6.2)</u>	<u>6. NO WRITTEN PROCEDURES FOR DETERMINING</u> <u>TANK CONDITION</u>
<u>40 CFR 265.52(a)</u>	<u>7. CONTINGENCY PLAN - DOES NOT INCLUDE ARRANGEMENTS</u> <u>WITH LOCAL AUTHORITIES (DESCRIPTION OF)</u>
<u>40 CFR 265.52(d)</u>	<u>8. CONTINGENCY PLAN - NEED COMPLETE PHONE</u> <u>NUMBER FOR EMERGENCY COORDINATIONS</u>
<u>40 CFR 265.52(h)</u>	<u>9. CONTINGENCY PLAN NOT SUBMITTED TO</u> <u>LOCAL AUTHORITIES</u>
<u>40 CFR 265.52(e)</u>	<u>10. CONTINGENCY PLAN DOES NOT HAVE A FULL</u> <u>LISTING OF ALL REQUIRED EQUIPMENT</u> <u>DESCRIPTION/LOCATION/CAPABILITIES.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106. The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

T0: Facility Name: GM Lines - CONTINUED  
Address: \_\_\_\_\_

EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

[illegible]

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The GM LEEDS FACILITY is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

MICHAEL SANDERSON, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by COM LFEDS will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call DAVID DOYLE (U.S. EPA) at 816/374-7133, or PAUL M. BELFORD MDUR ( ), at 314/751-3241.

This Notice prepared by John W. Bush Date 6/19/84

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.

Pink -AWCM

Yellow - ENSV

## Green -State

Printed Name: Jerome E. DANIELS Date 6/19/84

Signature: James E. Daniel

Title: DIRECTOR - PLANT ENGINEERING

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: G.M. LEEDS ASSEMBLY PLANT  
Address: 6817 STADIUM DRIVE  
KANSAS CITY, MISSOURI 64129  
EPA ID Nbr: MD000522/668 Date: 6/19/84

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
<u>40CFR265.15 (d) (1)</u>	<u>1. ALL SAFETY, EMERGENCY RESPONSE, SECURITY EQUIPMENT NOT ADDRESSED IN INSPECTION SCHEDULE</u>
<u>40CFR265.15 (d)</u>	<u>2. INSPECTION OF ALL EMERGENCY RESPONSE EQUIPMENT NOT DOCUMENTED IN A LOG.</u>
<u>40CFR265.16 (D.1)</u>	<u>3. LIST OF PERSONS FILLING HAZARDOUS WASTE MANAGEMENT POSITIONS NEEDS UPDATING</u>
<u>40CFR265.16</u>	<u>4. EMERGENCY COORDINATORS NOT PART OF PERSONNEL TRAINING PROGRAM.</u>

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA).

TO: Facility Name: GM LEADS - CONTINUED  
Address: \_\_\_\_\_  
EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
10 CSR 25-7.050(4)(6)	5. NO INSPECTIONS/DOCUMENTATION FOR SOLVENT STORAGE TANK
10 CSR 25-7.050(4)(6.2)	6. NO WRITTEN PROCEDURES FOR DETERMINING TANK CONDITION
40 CFR 265.52(c)	7. CONTINGENCY PLAN - DOES NOT INCLUDE ARRANGEMENTS WITH LOCAL AUTHORITIES (DESCRIPTION THERE-OF)
40 CFR 265.52(d)	8. CONTINGENCY PLAN - NEED COMPLETE PHONE NUMBER FOR EMERGENCY COORDINATIONS
40 CFR 265.53(b)	9. CONTINGENCY PLAN NOT SUBMITTED TO LOCAL AUTHORITIES
40 CFR 265.52(e)	10. CONTINGENCY PLAN DOES NOT HAVE A FULL LISTING OF ALL REQUIRED EQUIPMENT DESCRIPTION/LOCATION/CAPABILITIES.

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The \_\_\_\_\_ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to:

\_\_\_\_\_, Chief, Air and Waste Compliance Branch, U.S. Environmental Protection Agency, Region VII, 324 East Eleventh Street, Kansas City, Missouri 64106.

The corrective actions taken by \_\_\_\_\_ will be considered in determining whether any enforcement action, including the assessment of civil penalties, should be initiated.

If you have any questions on this Notice or wish to discuss your response you may call \_\_\_\_\_ (U.S. EPA) at 816/374-\_\_\_\_\_, or \_\_\_\_\_, at \_\_\_\_\_.

This Notice prepared by \_\_\_\_\_ Date \_\_\_\_\_

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Distribution:

Original-Facility Rep.  
Pink -AWCM  
Yellow -ENSV  
Green -State

Printed Name: \_\_\_\_\_ Date \_\_\_\_\_  
Signature: \_\_\_\_\_  
Title: \_\_\_\_\_

TO: Facility Name: GM LEADS - CONTINUED  
Address: \_\_\_\_\_  
EPA ID Nbr: \_\_\_\_\_ Date: \_\_\_\_\_

[illegible]

If you have any questions on this Notice or wish to discuss your response you may call DAVID DOYLE (U.S. EPA) at 816/374-7133, or PAUL MEIBELWERT MDUR ( ), at 314/751-3241.

This Notice prepared by John W. Borch Date 6/19/84

Printed Name: Jerome E. Daniels Date 6/19/84  
Signature: Jerome E. Daniels  
Title: DIRECTOR - PLANT ENGINEERING



GMAD- LEEDS PLANT  
HAZARDOUS WASTE STORAGE YARD

JUNE 19, 1984 PHOTO'S # B-8, B-9 AND B-10



GMAD-LEEDS PLANT

LOCATION OF UNDERGROUND STORAGE TANKS

JUNE 19, 1984      PHOTO'S # B-17 AND B-18

4-1-83

LA, CA.



3625 CHENSHEN

PLASTICS, INC.



20TH CENTURY



#A-2

ZNNNN 00 01 550

Name & Location: **GMAD - LEADS**

**K.C., MO.**

Date & Time: **6-4-84**

Photographer: **Bushy**

Camera Setting: **Auto**

Caption: **DRUM CRUSHER  
HW STORAGE YARD**

#A-6

ZNNNN 00 01 550

Name & Location: **GMAD - LEADS**

**K.C. MO**

Date & Time: **6-4-84**

Photographer: **Bushy**

Camera Setting: **Auto**

Caption: **HW STORAGE YARD**

#A-9

ZNNNN 00 01 550

Name & Location: **GMAD - LEADS**

**K.C. MO**

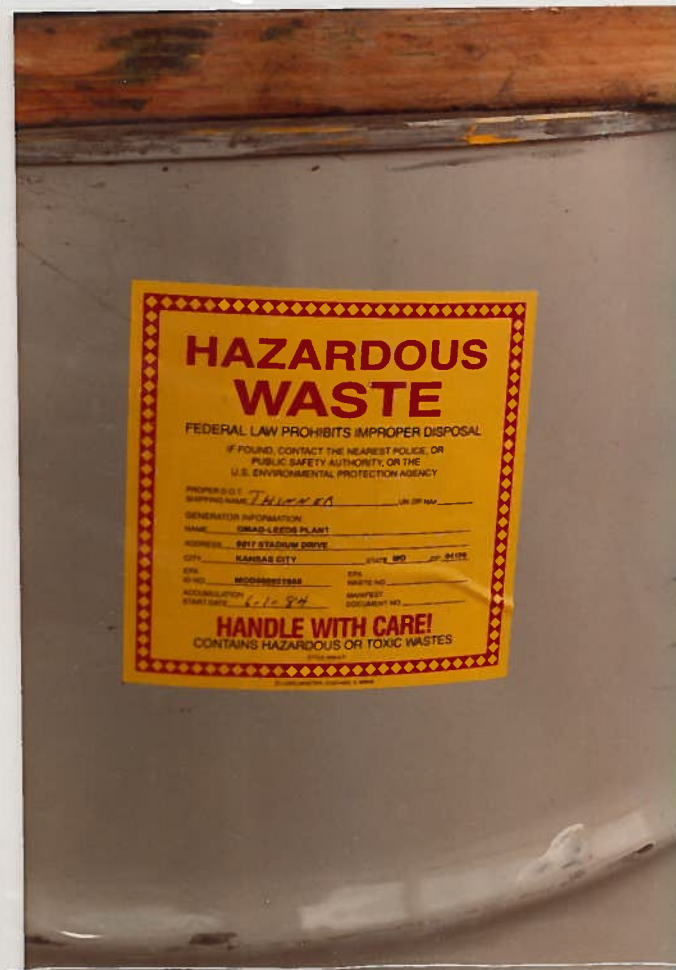
Date & Time: **6-4-84**

Photographer: **Bushy**

Camera Setting: **AUTO**

Caption: **2 DRUMS OF HW @  
STORAGE YARD**

45-62



4A-7

Name & Location: **GMAD - LEEDS**

**K.C. MO**

Date & Time: **6-4-84**

Photographer: **Bundy**

Camera Setting: **AUTO**

Caption: **DRUM OF HW @  
STORAGE YARD**

4A-8

Name & Location: **GMAD - LEEDS**

**K.C. MO**

Date & Time: **6-4-84**

Photographer: **Bundy**

Camera Setting: **AUTO**

Caption: **DRUM OF HW @  
STORAGE YARD**



GMAD - LEADS KANSAS CITY MISSOURI  
HAZARDOUS WASTE STORAGE YARD  
JUNE 4, 1984 PHOTOS # A-3, A-4, A-5

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.D.I.  
SHIPPING NAME: \_\_\_\_\_ UN OR NAH \_\_\_\_\_  
GENERATOR INFORMATION  
NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_  
EPA  
ID NO: \_\_\_\_\_ EPA  
WASTE NO: \_\_\_\_\_  
ACCUMULATION  
START DATE: \_\_\_\_\_ MANIFEST  
DOCUMENT NO: \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.D.I.  
SHIPPING NAME: \_\_\_\_\_ UN OR NAH \_\_\_\_\_  
GENERATOR INFORMATION  
NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_  
EPA  
ID NO: \_\_\_\_\_ EPA  
WASTE NO: \_\_\_\_\_  
ACCUMULATION  
START DATE: \_\_\_\_\_ MANIFEST  
DOCUMENT NO: \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR  
PUBLIC SAFETY AUTHORITY OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.D.I.  
SHIPPING NAME: \_\_\_\_\_ UN OR NAH \_\_\_\_\_  
GENERATOR INFORMATION  
NAME: \_\_\_\_\_  
ADDRESS: \_\_\_\_\_  
CITY: \_\_\_\_\_ STATE: \_\_\_\_\_  
EPA  
ID NO: \_\_\_\_\_ EPA  
WASTE NO: \_\_\_\_\_  
ACCUMULATION  
START DATE: 2-20-84 MANIFEST  
DOCUMENT NO: \_\_\_\_\_

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

KESSON CHEMICAL  
SOCIETY MO  
DIVE

L.A. CA. - # V-53



PLASTIC, INC. 3629 CRENSHAW,



20TH CENTURY



Name & Location:

GMAD-LEEDS  
K.C. MO

Date & Time:

6-19-84

Photographer:

Bundy

Camera Setting:

AUTO

Caption:

HW STORAGE YARD

Name & Location:

GMAD-LEEDS  
K.C. MO

Date & Time:

6-19-84

Photographer:

Bundy

Camera Setting:

AUTO

Caption:

Sign @ HW STORAGE  
YARD

Name & Location:

GMAD-LEEDS  
K.C. MO

Date & Time:

6-19-84

Photographer:

Bundy

Camera Setting:

AUTO

Caption:

Drive Camera @  
HW STORAGE YARD

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR  
PUBLIC SAFETY AUTHORITY, OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O. HAZARDOUS LHM OR MAP

GENERATOR INFORMATION

NAME EMAD-LEEDS PLANT

ADDRESS 8817 STADIUM DRIVE

CITY KANSAS CITY STATE MO ZIP 64119

EPA ID NO. MO0000072000

MANIFEST DOCUMENT NO. 6-17-84

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR  
PUBLIC SAFETY AUTHORITY, OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O. HAZARDOUS LHM OR MAP

GENERATOR INFORMATION

NAME EMAD-LEEDS PLANT

ADDRESS 8817 STADIUM DRIVE

CITY KANSAS CITY STATE MO ZIP 64119

EPA ID NO. MO0000072000

MANIFEST DOCUMENT NO. 6-17-84

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

OHIO SEALER

DATE 6-17-84 LOCATION DAYTON

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR  
PUBLIC SAFETY AUTHORITY, OR THE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O. HAZARDOUS LHM OR MAP

GENERATOR INFORMATION

NAME EMAD-LEEDS PLANT

ADDRESS 8817 STADIUM DRIVE

CITY KANSAS CITY STATE MO ZIP 64119

EPA ID NO. MO0000072000

MANIFEST DOCUMENT NO. 6-17-84

**HANDLE WITH CARE!**  
CONTAINS HAZARDOUS OR TOXIC WASTES

© 1987 HAZARD WASTE, INC.

#B-5

Name & Location: **GMAD - LEADS**  
**RC 110**  
Date & Time: **6-19-84**  
Photographer: **Bundy**  
Camera Setting: **Auto**  
Caption: **DRAM @ HW STORAGE**  
**YARD**

#B-6

Name & Location: **GMAD - LEADS**  
**RC 110**  
Date & Time: **6-19-84**  
Photographer: **Bundy**  
Camera Setting: **Auto**  
Caption: **DRAM @ HW STORAGE**  
**YARD**

#B-7

Name & Location: **GMAD - LEADS**  
**RC 110**  
Date & Time: **6-19-84**  
Photographer: **Bundy**  
Camera Setting: **Auto**  
Caption: **DRAM @ HW STORAGE**  
**YARD**

LA, CA. 4-7-83



PLASTICS, INC. 3628 CRENSHAW



20TH CENTURY



#B-13  
#B-14

Name & Location: **GNAD-LEEDS**  
**KC MO**

Date & Time: **6-19-84**

Photographer: **Boddy**

Camera Setting: **AUTO**

Caption: **LOCATION OF UNDERGROUND**  
**HW STORAGE TANK**

#B-14  
#B-15

Name & Location: **GNAD-LEEDS**  
**KC MO**

Date & Time: **6-19-84**

Photographer: **Boddy**

Camera Setting: **AUTO**

Caption: **UNDERGROUND STORAGE**  
**TANKS**

#B-15  
#B-16

Name & Location: **GNAD-LEEDS**  
**KC MO**

Date & Time: **6-19-84**

Photographer: **Boddy**

Camera Setting: **AUTO**

Caption: **VENTS FOR STORAGE**  
**TANKS - IN THE DIRTED AREA**